DuPont Legal, Environment Group
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April 29, 2013

Deena Sheppard, Enforcement Specialist
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard, SE-5J
Chicago, Illinois 60604-3590

Re: Gary Development Landfill, EPA Region 5 CERCLA Information Request
Dated February 26, 2013, to Ms Ellen J. Kullman, DuPont Company

Dear Ms. Sheppard:

The referenced information request to E. I. du Pont de Nemours and Company (DuPont) regarding the Gary Development Landfill (GDL) has been referred to me for reply.

After a diligent search for documents related to DuPont and GDL we have found in our files and in the documents provided by EPA Region 5 the following:

1. The undated, estimated date 1980, "Eckhardt Survey" response for the DuPont East Chicago Plant. It includes a FORM B for Gary Development Landfill, to include "Year first used" of 1978, and "Year last used ... or still in use" of 1979. It indicates a volume of 100 tons. It is not clear why page 2 is marked "Calumet Waste Management", likely the hauler, that entry is on the line for "Site Name". The only lines checked for "present in waste" are for "Inorganics" and "salts". FORM C identifies 6 haulers, to include Calumet Waste Systems. Attachment A.

2. An internal DuPont document entitled "Land Disposal Activity", undated, believed created around 1979 or 1980, it includes an entry for "Gary Land Development Landfill", 479 N. Cline Avenue, Gary, IN. 46406. It indicates disposal dates of 1978-1979, "Organic, inorganic waste, principally sulfamic acid waste". Attachment B.

3. Copies of handwritten notes entitled "Eckhardt Questionnaire East Chicago" undated, but apparently the worksheet for the survey noted in item 1, above. It includes an entry "Calumet Waste Systems (to Gary Land Development Landfill) 120 cubic yards of sulfamic acid waste, assume density of sulfamic acid 10#/gallon (per OJ Meyer) 120 x 202 gallons/yd x 10 = 242,400# = 121 tons". This seems consist with the entry of "1"on the questionnaire in response to "hundreds tons". Attachment C.

Not found in our files, but found in the material provided by EPA Region 5:

4. A chronology of "GARY DEVELOPMENT COMPANY, INC. LANDFILL" "*initiated by*" Matthew T. Klein of IDEM dated October 14, 1996, it is marked "Enforcement Sensitive". We understand that marking has been removed. There is an entry of November 18, 1977:

"A letter was issued to Mr. Wayne Slager, Calumet Waste Systems, P.O. Box 4147, Hammond, Indiana, 46324, from Mr. Hert regarding the one-time disposal of one hundred and twenty (120) cubic yards of herbicide waste from E. I. du Pont de Nemours Company, Inc. at the GDC Landfill. Mr. Slager had previously requested permission to dispose of the herbicide waste at the GDC Landfill through a letter dated October 31, 1977. *[Obtain the October 31, 1977 letter and determine the exact nature of the particular herbicide.]*" Attachment D.

5. A letter dated November [date note clear], 1977 to Mr. Wayne Slager, Calumet Waste Systems, from Oral H. Hert, Technical Secretary, assumed of the State of Indiana Stream Pollution Control Board, "Re: Disposal of Herbicide from DuPont, Incorporated", granting approval for "one-time only disposal of approximately 120 cubic yards of herbicide at the Gary Land Development Landfill...". It refers to a letter dated October 31, 1977, from Mr. Slager, we do not have a copy of that letter. Attachment E.

6. A page entitled "Sludge Load Analysis Sheet", source of material "General Drainage Inc. E. I. du Pont" dated Feb. 27 1976, identified as "Filter Aid", Quantity "80 cu. yds. per day", under the comment section: "This residual filter cake material, is predominately porous calcium carbonate, with small quantities of Al2O3, under infiltration of water based materials, thoroughly rinsed, prior to deposition. Minimum moisture concentration, would allow the classification of this material as a solid." Attached to that sheet is a sheet from William Bogner, apparently of Independent Waste Systems, to Mr. George Dayoff of the Indiana Board of Health indicating a proposal to take the filter cake to "Gary Land Development", approximately thirty yards a day of which 25% will be going to Gary Landfill and 75% going to Gary Atlas Cement to be reused. We understand there was a Gary Landfill, so this volume may not have been intended for Gary Development Landfill. Attachment F.

7. Letter Lake County Health Department July 7, 1982, Bates Stamped USS000392, attaching several pages from what appears to be a settlement with Gary Land Development that on a page Bates stamped USS000398 contains an entry "d. E. I. du Pont... Calcium Carbonate (30 cu. yds./day), ...Date of Approval ...10/4/76". Attachment G.

8. An EPA "Potential Hazardous Waste Site Tentative Disposition Form T2070-4", for Gary Development Landfill dated 3/10/80. It includes a page entitled "Attachment I Generators" that has 29 names, to include "E. I. DuPont". Attachment H.

9. Letter to File from Paul Hess, January 24, 1984, Bates Stamped USS000343 et seq, Attaching EPA "Potential Hazardous Waste Site Tentative Disposition Form T2070-4" for Gary Development Landfill dated 1/6/84, attaching a list of Generators that appears to be the same as that in Attachment H. Attachment I.

10. The August 20, 2012 Letter Response of Brandenburg Industrial Service Company by Susan E. Brice of Bryan Cave. On page 4 it refers to asbestos-containing pipe and equipment insulation, possibly two loads. On page 7 the letter indicates the DuPont material was from DuPont's East Chicago Site. The letter attaches an invitation to bid dated June 7, 1985, from Joseph M. Shields, Jr. on DuPont letterhead entitled "Dismantlement D-3607 East Chicago Plant – East Chicago, Indiana Central Shops and Miscellaneous Buildings". Apparently this letter was in the files at Brandenburg. Attachment J.

This is all the information we have been able to locate on GDL related to DuPont. We have not identified any employee with knowledge, or any additional information of volumes, transporters or prices. Two DuPont retirees are identified in the above documents, Mr. John T. Sixsmith, who filled out the Eckhardt survey and Mr. OJ Meyer, who consulted on the handwritten notes, both have passed away.

DuPont may be indemnified by its transporters and contractors, at this time we have not located the relevant contracts, nor is it clear whether any of the haulers still exist or possibly owned by successor companies.

DuPont does not have any insurance that would be applicable to GDL. The EPA ID Number for the DuPont East Chicago Site is IND 005-174-254. DuPont did not have any other manufacturing plants in this area 1975-89 when GDL operated. DuPont retains business records for a period of three years.

If you have any questions please contact me at the above phone number or email address.

Sincerely,

Bernard J. Reilly

Bernard J. Reilly
Corporate Counsel

BJR:dac
Enclosures

ATTACHMENT A

DuPont East Chicago Eckhardt
Survey Response 1980

FINAL

					(1-5)
					(DO NOT USE)

FORM A: GENERAL FACILITY INFORMATION

Company Name: E.I. DuPont de Nemours + Co
Division/Subsidiary: Chemicals, Dyes and Pigments
Facility Name: East Chicago

Address: 5215 Kennedy Ave
No. Street

East Chicago IN 46312
City State Zip Code

Name of Person Completing Form: John T Sixsmith

Position: Environmental Control Coordinator

Phone Number: ( )

1. Year Facility Opened ..... ~~19~~ 1892 (10-11)

2. Primary SIC Code 2819 (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:
USE ONLY TONS IF POSSIBLE - right justify response

thousand gallons ..... (16-24)

hundred tons 14 (25-32)

thousand cubic yards ..... (33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill 77 (42-44)

in pit/pond/lagoon ..... (45-47)

in deep well 14 (48-50)

incinerated 9 (51-53)

reprocessed/recycled ..... (54-56)

evaporated ..... (57-59)

unknown ..... (60-62)

other (Specify_____) ..... (63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950? 10 (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) 1 (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) 1 (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms 1973 (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms 1955 (73-74)

FINAL

(1-8) X
(DO NOT USE)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: EI DUPONT Division/Subsidiary CD+P
Facility Name: EAST CHICAGO
Name of Site: SAME
Address of Site: 5215 KENNEDY AVE
no. street
EAST CHICAGO IN 46312
city state zip code

Name of Owner (while used by facility): DUPONT
Address: SAME
no. street
city state zip code

Current Owner (if different from above):
Address:
no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 1 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership; 9=don't know) 1 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 19 (15-16) (1)
5. Year last used for process waste from this facility (enter "79" if still in use) 1979 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: Right justify response
   thousand gallons ..... (19-26)
   hundred tons 1510 (27-33) (2)
   thousand cubic yards ..... (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	3	(42)
landfill, mixed industrial waste	1	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	3	(45)
pits/ponds/lagoons	2	(46)
deep well injection	3	(47)
land farming	3	(48)
incineration	2	(49)
treatment (eg. neutralizing)	1	(50)
reprocessing/recycling	3	(51)
other (specify)	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 1 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

(1) No records - first use was prior to 1955.

(2) Estimate - No records available - Rate was probably about constant back to 1974 and figure given is for the period 1974 to 1978 inclusive.

FORM B CONTINUED ON SECOND PAGE

1 (80)

(1-5)
(DO NOT USE)

Company Name: EI DUPONT
Division/Subsidiary: CD+P
Facility Name: EAST CHICAGO
Site Name: SAME

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	1	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	1	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	1	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	1	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >30pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	1	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	1	(48)
trichloroethylene	1	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	1	(52)
oils and oil sludges	1	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	1	(68)

FINAL

(1-8) (DO NOT USE)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E I DuPont Division/Subsidiary CD+P
Facility Name: East Chicago
Name of Site: Ohio Liquid Disposal, Inc.
Address of Site: 504 Liberty Street
no. street
Fremont Ohio 43420
city state zip code

Name of Owner (while used by facility): Ohio Liquid Disposal
Address: _____
no. street
_____
city state zip code

Current Owner (if different from above): Chemical Waste Management
Address: _____
no. street
_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
   IF CLOSED, specify year closed ..... 19__ (13-14)
4. Year first used for process waste from this facility 1918 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1978 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: Right justify response
   thousand gallons ..... (19-26)
   hundred tons 5 (27-33)
   thousand cubic yards ..... (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	9	(42)
landfill, mixed industrial waste	9	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	9	(45)
pits/ponds/lagoons	9	(46)
deep well injection	1	(47)*
land farming	9	(48)
incineration	9	(49)
treatment (eg. neutralizing)	9	(50)
reprocessing/recycling	9	(51)
other (specify) _____	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* no longer used for facility waste, but may still be in use by the site.

CONTINUED ON REVERSE SIDE

FORM B - Page 2 FINAL

(1-5) (DO NOT USE)

Company Name: EI DuPont
Division/Subsidiary: CD+P
Facility Name: East Chicago
Site Name: Ohio Liquid Disposal

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<5	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	1	(25)
lead	2	(26)
Radioactive residues, >30 pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FINAL

(1-8) (DO NOT USE)

FORM 3: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E I DuPont Division/Subsidiary CD+P
Facility Name: East Chicago
Name of Site: American Chemical Service, Inc
Address of Site: Colfax Ave
no. street
Griffith Indiana 46319
city state zip code

Name of Owner (while used by facility): American Chemical Service Inc.
Address: PO Box 190
no. street
Griffith Indiana 46319
city state zip code

Current Owner (if different from above): _____
Address: _____
no. street
_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed ..... 19 _ _ (13-14)
4. Year first used for process waste from this facility 1976 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1976 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: Right justify response
   thousand gallons ..... (19-26)
   hundred tons ..... (27-33)
   thousand cubic yards ..... (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	9	(42)
landfill, mixed industrial waste	9	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	9	(45)
pits/ponds/lagoons	9	(46)
deep well injection	9	(47)
land farming	9	(48)
incineration	1	(49)*
treatment (eg. neutralizing)	9	(50)
reprocessing/recycling	9	(51)
other (specify) _____	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* no longer used for facility waste, but may still be in use by the site

FORM 5 - Page 2 FINAL

(1-5)
(DO NOT USE)

Company Name: EI DUPONT
Division/Subsidiary: CD+P
Facility Name: EAST CHICAGO
Site Name: AMERICAN CHEMICAL SERVICE, INC

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	1	(68)

FINAL

(1-8) (DO NOT USE)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: EI DuPont Division/Subsidiary CD+P
Facility Name: East Chicago
Name of Site: Seymour Recycling
Address of Site: PO Box 665
no. street
Seymour Indiana
city state zip code

Name of Owner (while used by facility): Seymour Recycling
Address: PO Box 665
no. street
Seymour IN
city state zip code

Current Owner (if different from above): Chem-Dyne
Address: 500 Ford Blvd
no. street
Hamilton Ohio 45010
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership; 9=don't know) 3 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
   IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 1978 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1978 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: Right justify response
   thousand gallons ..... (19-26)
   hundred tons 2 (27-33)
   thousand cubic yards ..... (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

all truck trucks shipments

landfill, mono industrial waste	9	(42)
landfill, mixed industrial waste	9	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	9	(45)
pits/ponds/lagoons	9	(46)
deep well injection	9	(47)
land farming	9	(48)
incineration	1	(49)*
treatment (eg. neutralizing)	9	(50)
reprocessing/recycling	9	(51)
other (specify)	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* no longer used for facility waste but may still be used by the site

(1-5) (DO NOT USE)

Company Name: EI DuPont
Division/Subsidiary CD+P
Facility Name: East Chicago
Site Name: Seymour Recycling

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<5	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	1	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	1	(68)

FINAL

(DO NOT USE) (1-8)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E.I. DuPont [illegible] Inc Division/Subsidiary: CD+P
Facility Name: East Chicago
Name of Site: Hartley and Hartley, Inc
Address of Site: 2371 S. Two Mile Rd
no. street
Kawkawlin, Mich 48506
city state zip code

Name of Owner (while used by facility): SCA Chemical Wastes Services
Address: 60 State St
no. street
Boston MA 02109
city state zip code

Current Owner (if different from above):
Address:
no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership; 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility ..... 19[7][7] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][8] (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: Right justify response
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons ..... [ ][ ][ ][ ][ ][ ][2] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	9	(42)
landfill, mixed industrial waste	9	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	9	(45)
pits/ponds/lagoons	9	(46)
deep well injection	9	(47)
land farming	9	(48)
incineration	2	(49)*
treatment (eg. neutralizing)	9	(50)
reprocessing/recycling	9	(51)
other (specify) ____	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* No longer used for facility waste, but may still be in use by the site.

FORM B - Page 2 FINAL

(1-5) (DO NOT USE)

Company Name: EI DuPont
Division/Subsidiary: CD+P
Facility Name: EAST CHICAGO
Site Name: Huntley + Huntley, Inc

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<5	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	1	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	1	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	1	(68)

FINAL

(DO NOT USE) (1-8)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E.I. DUPONT DeNEMOURS + CO Division/Subsidiary: C D + P
Facility Name: EAST CHICAGO
Name of Site: LIQUID DISPOSAL, INC
Address of Site: _____
no. street
UTICA MICHIGAN
city state zip code

Name of Owner (while used by facility): Same
Address: _____
no. street
_____
city state zip code

Current Owner (if different from above): _____
Address: _____
no. street
_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership; 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed ..... 19 _ _ (13-14)
4. Year first used for process waste from this facility 19 7 8 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 7 9 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: Right justify response
   thousand gallons ..... _ _ _ _ _ _ _ (19-26)
   hundred tons ..... _ _ _ _ _ _ _ (27-33)
   thousand cubic yards ..... _ _ _ _ _ _ _ (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	3	(42)
landfill, mixed industrial waste	3	(43)
landfill, drummed waste	3	(44)
landfill, municipal refuse co-disposed	3	(45)
pits/ponds/lagoons	3	(46)
deep well injection	3	(47)
land farming	3	(48)
incineration	1	(49)
treatment (eg. neutralizing)	3	(50)
reprocessing/recycling	3	(51)
other (specify) _____	3	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 1 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

FORM 3 - Page 2 FINAL

(1-5)
(DO NOT USE)

Company Name: EI DUPONT
Division/Subsidiary: CD+P
Facility Name: EAST CHICAGO
Site Name: LIQUID DISPOSAL, INC

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<5	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	1	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	1	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	1	(68)

FINAL

(1-8) | | | | | | | | (DO NOT USE)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E I DuPont Division/Subsidiary: CD+P
Facility Name: East Chicago
Name of Site: Hyon Waste Management
Address of Site: 117 S Stony Island Ave
no. street
Chicago Il 60617
city state zip code

Name of Owner (while used by facility): Hyon Waste Management
Address: 117 S Stony Island
no. street
Chicago Il 60617
city state zip code

Current Owner (if different from above): Envirotherm/Illinois, Inc
Address: 117 S Stony Island
no. street
Chicago, Il 60617
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership; 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
   IF CLOSED, specify year closed ..... 19 | | (13-14)
4. Year first used for process waste from this facility 19 76 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 76 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: Right justify response
   thousand gallons ..... | | | | | | | | (19-26)
   hundred tons ..... | | | | | | | | (27-33)
   thousand cubic yards ..... | | | | | | | | (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	9	(42)
landfill, mixed industrial waste	9	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	9	(45)
pits/ponds/lagoons	9	(46)
deep well injection	9	(47)
land farming	9	(48)
incineration	1	(49)*
treatment (eg. neutralizing)	9	(50)
reprocessing/recycling	9	(51)
other (specify)	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* was used for facility waste, but may still be used by the site.

(1-5)
(DO NOT USE)

Company Name: E I DuPont
Division/Subsidiary CD+P
Facility Name: East Chicago
Site Name: Hyon Waste Management

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	1	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	1	(68)

FINAL

FORM B: DISPOSAL SITE INFORMATION

[| | | | | | | |] (1-8) (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: EI DuPont   Division/Subsidiary: CD+P

Facility Name: East Chicago

Name of Site: Gary Land Development Landfill

Address of Site: 479 N. Cline Ave
no. street

Gary Indiana 46406
city state zip code

Name of Owner (while used by facility): ____________

Address: ____________
no. street

____
city state zip code

Current Owner (if different from above): ____________

Address: ____________
no. street

____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership; 9=don't know) ..... [9] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[|] (13-14)
4. Year first used for process waste from this facility ..... 19[7|8] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7|9] (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... [| | | | | | |] (19-26)
   Right justify response hundred tons ..... [| | | | | | |7] (27-33)
   thousand cubic yards ..... [| | | | | | |] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	[9]	(42)
landfill, mixed industrial waste	[9]	(43)
landfill, drummed waste	[9]	(44)
landfill, municipal refuse co-disposed	[1]	(45)
pits/ponds/lagoons	[9]	(46)
deep well injection	[9]	(47)
land farming	[9]	(48)
incineration	[9]	(49)
treatment (eg. neutralizing)	[9]	(50)
reprocessing/recycling	[9]	(51)
other (specify) ____________	[9]	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [9] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

FORM B CONTINUED ON SECOND PAGE

[1] (80)

(1-5)
(DO NOT USE)

Company Name: EI DuPONT
Division/Subsidiary CD+P
Facility Name: EAST CHICAGO
Site Name: CALUMET WASTE MANAGEMENT

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >30pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FINAL

(DO NOT USE) | | | | | | | | (1-8)

FORM 3: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E I DuPont Division/Subsidiary: CD+P

Facility Name: East Chicago

Name of Site: 49'er Landfill

Address of Site: _____
no. street

Porter County IN
city state zip code

Name of Owner (while used by facility): _____

Address: _____
no. street

_____
city state zip code

Current Owner (if different from above): _____

Address: _____
no. street

_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) 9 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed ..... 19 | | (13-14)
4. Year first used for process waste from this facility 19 7 9 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 7 9 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... | | | | | | | (19-26)
   Right justify response hundred tons ..... | | | | | | 1 0 (27-33) *
   thousand cubic yards ..... | | | | | | | (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	9	(42)
landfill, mixed industrial waste	1	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	9	(45)
pits/ponds/lagoons	9	(46)
deep well injection	9	(47)
land farming	9	(48)
incineration	9	(49)
treatment (eg. neutralizing)	9	(50)
reprocessing/recycling	9	(51)
other (specify) _____	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* 41 Tons

FORM B - Page 2 FINAL

(1-8)
(DO NOT USE)

Company Name: E I DUPONT
Division/Subsidiary: CD+P
Facility Name: [illegible]
Site Name: 49'er Landfill

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curries/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FINAL

(1-8) (DO NOT USE)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E I DuPont Division/Subsidiary CD+P
Facility Name: East Chicago
Name of Site: CD Landfill
Address of Site: [illegible]
no. street
Calumet City, Ill 60409
city state zip code

Name of Owner (while used by facility): Waste Management Inc
Address: P.O. Box 1296
no. street
Calumet City Ill. 60409
city state zip code

Current Owner (if different from above): _____
Address: _____
no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) 9 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed ..... 19[ ] (13-14)
4. Year first used for process waste from this facility 1928 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1979 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... [ ] (19-26)
   Right justify response hundred tons ..... 0 (27-33)*
   thousand cubic yards ..... [ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	9 (42)
landfill, mixed industrial waste	9 (43)
landfill, drummed waste	9 (44)
landfill, municipal refuse co-disposed	1 (45)
pits/ponds/lagoons	9 (46)
deep well injection	9 (47)
land farming	9 (48)
incineration	9 (49)
treatment (eg. neutralizing)	9 (50)
reprocessing/recycling	9 (51)
other (specify) _____	9 (52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* 4 Tons

FORM B CONTINUED ON SECOND PAGE

1 (80)

FORM B - Page 2 FINAL

(1-5)
(DO NOT USE)

Company Name: EI DUPONT
Division/Subsidiary CD+P
Facility Name: EAST CHICAGO

Site Name: CID Landfill

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FINAL

FORM C: HAULER INFORMATION

(1-5) (DO NOT USE)

PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS, INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Company Name: E I DuPont De Nemours + Co, Inc
Division/Subsidiary: Chemicals, Dyes and Pigments
Facility Name: East Chicago

Name of Firm or Contractor	Address	ICC # (If Known)	Years Used
Hartley + Hartley	Kawkawlin, Mich		1? 2
Nelson Chemical	Detroit Mich		1
Chem Dyne	Hamilton, Ohio		1
MR Franic, Inc	South Holland, Ill		1
Chemical Waste Management	PO Box 1296 Calumet City, Ill. 60409		1
Calumet Waste Systems	PO Box 4147 Hammond Ind 46324		1

FINAL

		(1-5)
(DO NOT USE)		

FORM A: GENERAL FACILITY INFORMATION

Company Name: E.I. DuPont de Nemours + Co
Division/Subsidiary: Chemicals, Dyes and Pigments
Facility Name: East Chicago

Address: 5215 Kennedy Ave
No. Street

East Chicago IN 46312
City State Zip Code

Name of Person Completing Form: John T Sixsmith

Position: Environmental Control Coordinator

Phone Number: ( )

1. Year Facility Opened 1892 (10-11)

2. Primary SIC Code 2819 (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:
USE ONLY TONS IF POSSIBLE - right justify response

thousand gallons		(16-24)
hundred tons	34	(25-32)
thousand cubic yards		(33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill	77	(42-44)
in pit/pond/lagoon		(45-47)
in deep well	14	(48-50)
incinerated	9	(51-53)
reprocessed/recycled		(54-56)
evaporated		(57-59)
unknown		(60-62)
other (Specify _____)		(63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950? 10 (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) 1 (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) 1 (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms 1973 (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms 1955 (73-74)

FINAL

(DO NOT USE) | | | | | | | | (1-8) X

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E I DUPONT Division/Subsidiary: CD+P
Facility Name: EAST CHICAGO
Name of Site: SAME
Address of Site: 5215 KENNEDY AVE
no. street
EAST CHICAGO IN 46312
city state zip code

Name of Owner (while used by facility): DUPONT
Address: SAME
no. street
city state zip code

Current Owner (if different from above):
Address:
no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 1 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership; 9=don't know) 1 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed ..... 19 | | (13-14)
4. Year first used for process waste from this facility ..... 19 | | (15-16) (1)
5. Year last used for process waste from this facility (enter "79" if still in use) 1979 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... | | | | | | | (19-26)
   Right justify response hundred tons ..... | | | 1 | 5 | 0 | (27-33) (2)
   thousand cubic yards ..... | | | | | | | (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	3	(42)
landfill, mixed industrial waste	1	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	3	(45)
pits/ponds/lagoons	2	(46)
deep well injection	3	(47)
land farming	3	(48)
incineration	2	(49)
treatment (eg. neutralizing)	1	(50)
reprocessing/recycling	3	(51)
other (specify)	9	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 1 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

(1) No records - first use was prior to 1955.

(2) Estimate - No records available - Rate was probably about constant back to 1974 and figure given is for the period 1974 to 1978 inclusive.

FORM B CONTINUED ON SECOND PAGE

1 (80)

(1-5)
(DO NOT USE)

Company Name: EI DUPONT
Division/Subsidiary: CD+P
Facility Name: EAST CHICAGO
Site Name: SAME

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<5	1	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	1	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	1	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	1	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	9	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	9	(50)
solvents halogenated aliphatic	9	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	1	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	1	(68)

Plant East Chicago

Location East Chicago, IN

LAND DISPOSAL ACTIVITY
(A) Past Practice

General Description of Disposal Facility	Disposal Dates	General Description of Wastes	Facility Construction	Site and/or Groundwater Conditions	Mainly Du Pont Use	Current Site Ownership
Waste pile	1909-69	Waste from manufacture of zinc, aluminum & ammonium chlorides	Waste pile, ~300' x 300'	Unknown		
Waste pile	Thru 1955	Chain grate stoker ash from old powerhouse	Waste pile, ~1,000' x 400'	Unknown		
Waste pile	1926-51	Calcium sulfate from trisodium phosphate operation	Waste pile, ~1,000' x 400'	Unknown		
General dump area	1955-78	Misc. chemicals, including sulfur and filter aid	Waste pile, ~1,000' x 1,000'	Unknown		
Neutralizing pit	1941-77	HCl from Freon® operations	~200' x 200' unlined pit containing limestone	Unknown		
Waste pile	1947-67	Zinc sinters from roasters, sulfur, & sulfur filter aid	Waste pile, ~400' x 500'	Unknown		
Waste pile	Thru 1969	Fly ash from old powerhouse	Waste pile, ~400' x 200'	Unknown		
Waste pile	1910-49	Lead arsenate and calcium arsenate wastes	Waste pile, ~400' x 200'	Unknown		

ATTACHMENT B
DuPont internal Waste Survey, East Chicago 1980

1980 Waste Survey
DuPont E. Chicago

WASTE DISPOSAL SURVEY
ON-SITE LAND DISPOSAL ACTIVITY - PAST PRACTICE

GENERAL DESCRIPTION OF DISPOSAL FACILITY	DISPOSAL DATES	GENERAL DESCRIPTION OF WASTES	FACILITY CONSTRUCTION	SITE AND/OR GROUND-WATER CONDITIONS
1) Waste Pile	1909-1969	Waste from Zinc, aluminum, and ammonium chloride manufacture	Waste pile ∿300' x 300'	Unknown
2) Waste Pile	Thru 1950	Chain grate stoker ash from old powerhouse	Waste pile ∿1000' x 400'	Unknown
3) Waste pile	1926-1951	Calcium phosphate from trisodium phosphate operation	Waste pile ∿1000' x 400'	Unknown
4) General Dump Area	1955-1974	Misc. Chemicals, including sulfur and filter aid	Waste pile ∿1000 x 1000	Unknown
5) Neutralizing Pit	1941-1974	HCl from Freon operations	∿200' x 200' unlined pit containing limestone	Unknown
6) Waste Pile	1947-1967	Zinc sinters from roasters, sulfur, and sulfur filter aid	Waste pile ∿400' x 500'	Unknown
7) Waste Pile	Thru 1969	Fly ash from old powerhouse	Waste pile ∿400' x 200'	Unknown
8) Waste Pile	1910-1949	Lead arsenate and calcium arsenate wastes	Waste pile ∿400' x 200'	Unknown
9) Waste Landfill	1974-1977	Calcium Fluoride	Clay-lined landfill ∿200' x 250'	Unknown

EAST [illegible]

10/20/[illegible]

WASTE DISPOSAL SURVEY
ON-SITE LAND DISPOSAL ACTIVITY - CURRENT PRACTICE

GENERAL DESCRIPTION OF DISPOSAL FACILITY	DISPOSAL DATES	GENERAL DESCRIPTION OF WASTES	FACILITY CONSTRUCTION	SITE AND/OR GROUND-WATER CONDITIONS
Landfill	1974-Current	Wastewater treatment sludge	1000' x 400' Unlined land-fill	Unknown

WASTE DISPOSAL SURVEY
OFF-SITE CHEMICAL AND PROCESS WASTE DISPOSAL - PAST PRACTICE

GENERAL DESCRIPTION OF DISPOSAL FACILITY	DISPOSAL DATES	GENERAL DESCRIPTION OF WASTES	Dioxin Suspected	CURRENT SITE OWNERSHIP/DISPOSAL SITE
Incinerator	1976	Organic waste - Ag Chem Formulation	NO	American Chemical Service, Inc. Colfax Avenue P. O. Box 190 Griffith, IN. 46319
Incinerator	1978	Organic waste - Ag Chem Formulation (Principally Toluene)	NO	Seymour Recycling Corp. P. O. Box 665 Seymour, IN.
Incinerator	1977-1978	Organic waste - Ag Chem Formulation	NO	Hartley & Hartley, Inc. 2371 S. Two Mile Rd. Kawkawlin, Mich. 48506
Incinerator	1976	Organic waste - Ag Chem Formulation	NO	Hyon Waste Management 117 S.Stony Island Ave. Chicago, IL. 60617
Landfill, Municipal refuse co-disposed	1978-1979	Organic, inorganic waste, prinicpally sulfamic acid waste	NO	Gary Land Development Landfill 479 N. Cline Avenue Gary, IN. 46406
Landfill, Mixed Industrial Waste	1979	Asbestos	NO	49'er Landfill Porter County, IN.

EAST CHICAGO

WASTE DISPOSAL SURVEY
OFF-SITE CHEMICAL AND PROCESS WASTE DISPOSAL - CURRENT PRACTICE

GENERAL DESCRIPTION OF DISPOSAL FACILITY	DISPOSAL DATES *	GENERAL DESCRIPTION OF WASTES	Mainly DuPont	CURRENT SITE OWNERSHIP/DISPOSAL SITE
Deepwell Injection	1978-1980	Contaminated sulfuric acid	No	Chemical Waste Management Ohio Liquid Disposal, Inc. 504 Liberty Street Fremont, Ohio 43420
Incinerator	1978-1980	Organic waste - Ag Chem Formulation	No	Liquid Disposal, Inc. Utica, Mich.
Landfill, municipal refuse co-disposed	1978-1980	Inorganic and organic waste- Ag Chem process waste and floor sweepings, sulfamic acid waste	No	CID Landfill Waste Management, Inc. P. O. ox 1296 Calumet City, IL. 60409
Incinerator	1980	Organic waste - Ag Chem formulation (Principally Toluene)	No	Rollins Environmental Services, Inc. P. O. Box 221 Bridgeport, NJ 08014
Incinerator	1979-1980	Organic waste - Ag Chem Formulation	No	E. I. du Pont de Nemours, Inc. Pontchartrain, La.

* AND CONTINUING

EXIT INTERVIEW

WASTE DISPOSAL SURVEY
CHEMICAL AND PROCESS WASTE
OFF SITE HAULERS - PAST PRACTICE

FIRM OR CONTRACTOR	ADDRESS	YEARS USED
Hartley & Hartley, Inc.	2371 S. Two Mile Rd. Kawkawlin, Mich. 48506	2
Chem Dyne	Hamilton, Ohio	1
Mr. Frank, Inc.	South Holland, Illinois	1

FILT CHICAGO

WASTE DISPOSAL SURVEY
CHEMICAL AND PROCESS WASTE
OFF-SITE HAULERS - CURRENT PRACTICE

FIRM OR CONTRACTOR USED	ADDRESS	DISPOSAL SITE	YEARS
S&J Transport	Woodstown, N.J.	Rollins Environmental Services, Inc. Bridgeport, N.J.	1980
Nelson Industrial	Detroit, Mich.	Liquid Disposal, Inc. Utica, Mich.	1977-1980
Rogers Cartage	1302 5th Avenue Roby, IN. 40326	Ponchartrain, La.	1979-1980
Chemical Waste Management	P. O. Box 1296 Calumet City, IL. 60409	1) Ohio Liquid Disposal, Inc. 2) CID Landfill	1979-1980

12/30/80

EAST CHICAGO

WASTE DISPOSAL SURVEY
ENVIRONMENTAL PROBLEMS

1) Seymour Recycling Corp., Seymour, Indiana is under indictment for failure to clean up drums of waste.

2) Region V EPA is requesting more information about the East Chicago Plant's disposal practices. (See attached letter EPA to JTS 8/29/80.)

CC-DDA 10/10/80
RJA

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5EHMWEB

AUG 2 9 1980

RECEIVED
PLT MGR OFFICE
DUPONT COMPANY
EAST CHICAGO INDIANA
Sep 2 1980
AM 7 8 9 10 11 12 1 2 3 4 5 6 PM

Mr. J.T. Sixsmith
Environmental Control Coordinator
E.I. duPont de Nemours & Company
5215 Kennedy Avenue
East Chicago, Indiana 46312

Dear Mr. Sixsmith:

Thank you for your reply to the United States Environmental Protection Agency (U.S. EPA) Information Request of March 21, 1980. U.S. EPA has fully reviewed the information provided in response to the request and has identified certain areas of concern which require further assessment. The following is a discussion of these areas of concern and the additional information needed in order to fully assess the hazards associated with on-site disposal at the E.I. duPont East Chicago Plant.

Groundwater Contamination: U.S. EPA believes that the disposal practices at the E.I. duPont Plant may be a source of groundwater contamination. A study is needed to determine if the groundwater is contaminated and the extent of that contamination. It will also be necessary to determine the flow direction of the groundwater and whether it is in communication with the Grand Calumet River. Of particular concern to U.S. EPA are the following substances which may have contaminated the groundwater at the indicated disposal areas which were identified on the map included in your response:

Meeting scheduled w/EPA week of 11/10 to discuss this. 11/6

1. Vanadium pentoxide, area 4.
2. Antimony pentachloride, area 5.
3. Calcium arsenate, area 8.
4. Lead arsenate, area 8.
5. Arsenic trioxide, area 8.
6. Dichlorobenzene/Chlorobenzene (by-product of the degradation of linuron), area 9.
7. Ammonium sulfamate (from cake filter disposal), area 9.
8. Sodium hydroxide (from precoat filter and hardtac waste), area 9.
9. Calcium hydroxide (present in hardtac, precoat and Freon Sludges), areas 9 and 10.

Airborne Emissions: Twelve of the substances disposed of at the East Chicago site are dangerous upon inhalation. It is necessary to determine whether any of the following substances may become airborne in any manner. The following list indicates air concentration limits prescribed for each substance in 29 CFR 1910.1000.

1.	Ammonium sulfamate	15 mg/M^3	(8-hours time weighted average) (8-hTWA)
2.	Antimony pentachloride (as Sb)	0.5 mg/M^3	(8-hTWA)
3.	Hydrochloric acid	7 mg/M^3	(Ceiling value)
4.	Calcium arsenate	1 mg/M^3	(8-hTWA)
5.	Lead arsenate	0.15 mg/M^3	(8-hTWA)
6.	Arsenic trioxide (as As)	0.5 mg/M^3	(8-hTWA)
7.	Calcium fluoride (as F)	2.5 mg/M^3	(8-hTWA)
8.	Chlorobenzene	350 mg/M^3	(8-hTWA)
9.	Sodium hydroxide	2 mg/M^3	(8-hTWA)
10.	Silica	various formulae depending on form	(8-hTWA)
11.	Vanadium pentoxide	0.5 mg/M^3dust	(8-hTWA)
		0.1 mg/M^3fume	
12.	Zinc Oxide	5 mg/M^3	(8-hTWA)

In addition, calcium hydroxide is considered to be an air contaminant as a dust, and calcium sulfate and sulfur have toxic and/or reactive fumes upon heating.

Process Information: It may be possible to assess the problems at specific disposal areas more fully if the amounts of some of the disposed wastes can be estimated. Additionally, it may be possible to further identify compounds existing in some of the areas. In order to accomplish this U.S. EPA is requesting information concerning process descriptions, raw materials used in production, and quantities of production for the following substances:

1. Zinc chloride
2. Aluminum chloride

3. Ammonium chloride

4. Those substances for which tank and process cleaning sludges were disposed of in area 4.

5. Calcium arsenate

6. "Ammate"

7. Benomyl

8. Siduron

Miscellaneous Information: Some further information which will be helpful in the continuing review of disposal at the East Chicago Plant is as follows:

1. Analysis of or information on the arsenic, vanadium, uranium, and uranium decay product concentrations in the phosphate rock used for trisodium phosphate production.

2. What "miscellaneous chemicals" may have been disposed of in area 4?

3. What chemical(s) was (were) used to neutralize by-product hydrochloric acid, and what other chemicals, if any, were contained in this acid (area 5)?

U.S. EPA is certain that E.I. duPont shares its concerns relating to the disposal practices in East Chicago. Your continued effort and cooperation in gaining a full assessment of the disposal area is greatly appreciated. Please feel free to contact either Jerrold Frumm, an attorney on my staff at (312) 353-2096 or William E. Muno an engineer on my staff, at (312) 353-2110 concerning the additional information requested in this letter.

Very truly yours,

Sandra S. Gardebring
Director, Enforcement Division

cc: Oral Hert, Technical Secretary
Indiana Stream Pollution Control Board

EAST CHICAGO

10/22/80

WASTE DISPOSAL SURVEY
ADDITIONAL INFORMATION

1) No waste disposal activities which are "Current Practice" were designated as hazardous.

2) All U.S. off-site disposal practices that are contained in Du Pont or publicly available data are listed in the preceeding charts.

Eckhardt Questionnaire East Chicago

ATTACHMENT C
DuPont East Chicago Handwritten Notes "Eckhardt Questionaire"

Hmetley + Hmetley

1977 - Hexane - (Siduron) waste - 167,700# = 84 tons
1976 None
1978 toluene - (Velpar) waste - 160,840 # = 80 tons
Incinerated TOTAL 164 tons
= 2×10^2 tons

Liquid Dispark, Utica, Mich (nelson Chem)

1978 - toluene (velpar) waste - 46200
Siduron waste 54060
100260 = 50 tons
= 1×10^2 tons

Seymour Recycling

1976 - 0
1977 - 0
1978 - toluene (Velpar) waste - 335,980# = 168 tons
= 2×10^2 tons

Hyon Waste Management - toluene (Siduron) waste,

1975 - 12 000 gallons x .66 x 8.34 = 66,000 # estimate
1976 - - - 211,360 #
1977 & 8 0
277,360 = 140 tons
= 1×10^2 tons

American Chemical Services

1976 - toluene (helpan) wastes - 166840 # = 83 tons
1977+8 - 0
= 1×10^2 tons

Otto Liquid Disposal

1978 WASTES

- Nelson Chemical (to Liquid Disposal, Incineration) -
  142 drums of Siduron wastes - 3 loads
  54,060# = 27 tons

- Nelson Chemical (to Liquid Disposal Incineration) -
  Velpar wastes, principally toluene - 2 loads
  46,200 # = 23 tons

- Chem Dyne (to Seymour Recycling - Incinerator) -
  Velpar Wastes - principally toluene - 13 loads
  335,980# = 168 tons

- Hartley + Hartley - Incineration
  Velpar wastes - principally toluene - 7 loads
  160,840# = 80 tons

- Calumet Waste Systems - (to Gary Land Development Landfill)
  120 cubic yards of Sulfamic acid waste.
  Assume Density of sulfamic acid @ 10 #/gallon (per OJ Meyer)
  $120 \times 202 \frac{\text{gallons}}{\text{yd}} \times 10 = 242,400\# = 121$ tons

- Calumet Waste Management (Believe went to CID Landfill)
  14 drums of Chlorohydrol solution - $Al_2O_3 \cdot Cl$
  total weight - 8600 # = 4 tons

- Ohio Liquid Disposal - (Deep well)
  11 tank cars of Ammonium sulfamate soln @ 11 #/gallon
  $11 \times 8000 \times 11 = 968000\# = 484$ tons

- Lime PPT or $CaSO_4$ + Diatomaceous earth from waste treatment. – (Plant Landfill) See attached

4,511,400# = 2256 TONS

- Sludges from cleaning H_2SO_4 + Silicate tanks – Landfill on plant

- Estimate – from Zaborski for silicate – 3200 ft^3/yr @ 14#/gal

3200 × 7½ × 14 = 336000 # = 168 tons

- My estimate for sulfuric – 1 tank/yr – 24'D with 1 ft of $CaSO_4$ sludge – sp.g 3

$\pi \times 12 \times 12 \times 1 \times 3 \times 62.4 = 84690$# = 42 tons

- Cleanout from Accham – 2570# – Landfill on plant. = 1 TON

- Calumet Waste Systems – Landfill – 49'er Landfill Asbestos

300 cubic yards · guess 10#/ft^3

300 × 10 × 27 = 81000# 41 tons

34M

Grand total – 3415 tons Round off to 3400 = TONS

1978 Cost Sheets

pH Control 003

Hyflo Supercel	665,200 #
Lime Hydrated	420,300 #
Solka Floc	0
Eagle Picher Celatom FW-14	0

SULFATE LIME NEUTRALIZATION

Lime Hydrated	1,325,800 #

LUDOX HS UPFLOW

Hyflo Supercel	27,200
Solka Floc	6800

LUDOX HS CONSOL

Hyflow Supercel	196,400
Solka Floc	28,900

ZIMMERSKI ESTIMATED 2000 #/DAY OF SUSPENDED SOLIDS removed from turkey, glass, etc.

total Supercel	888800 #	
total Solka Floc	35700 #	924,500 #
total Diatomaceous Granules + Cellulose	924500	

CALCIUM SULFATE — Calculated from Lime Neutralization

$Ca(OH)_2 + H_2SO_4 = CaSO_4$ $\frac{136}{74} \times 1,325,800 =$ 2436,600 #

CALCIUM HYDROXIDE - (pH control) - 420,300 #

Suspended Solids (Zatorsky est)

2000 × 365 = 730,000 730,000#

Grand total – 4,511,400# = 2256 TONS

Breakdown of end use OF 1978 wastes

Incinerator	Landfill	Deep well
27 tons	121 tons	484
23 "	4 "	
168 "	2256 "	
80 "	168 "	
	42 "	
	1 "	
	41 "	
298/3415 = 9%	2633/3415 = 77%	484/3415 = 14%

2633
46
2587 T/yr in plant landfill

1974 thru 1977 500 Tons in plant landfill CdF from Lucon

1974 - 1977 = 3087 × 4 = 12,348
1978 = 2587
14,935 Tons/yr say 15,000 T/yr

Mr. Palin telephoned Mr. Grant to determine the status of the GDC hearing before the SPCB. Mr. Grant advised that Vulcan Materials and GDC were to be scheduled for hearing together. Mr. Grant believed the next SPCB meeting would occur after August 16, 1977.

August 8, 1977

Mr. Patin conducted an inspection of the GDC Landfill at 1:45pm. Mr. Palin observed that the Vulcan pit west of the GDC Landfill was full of water and still leaching into the GDC Landfill pit.

September 6, 1977

A letter was issued to Mr. Carl Broman, Youngstown Sheet & Tube Company, 3001 Dickey Road; East Chicago, Indiana, 46312, from Mr. Hert regarding the approval to dispose of oily waste from the 6-Stand Oil Recovery Unit at the GDC Landfill. This oily waste previously temporarily approved for disposal at the GDC Landfill on March 4, 1977. The letter noted that the ISBH determined that the GDC Landfill was capable of absorbing the oily waste from the 6-Stand Oil Recovery Unit. The letter further noted that approximately twelve hundred (1,200) gallons per day of the oily waste was generated by Youngstown Sheet & Tube Company for disposal at the GDC Landfill.

November 18, 1977

A letter was issued to Mr. Wayne. Slager, Calumet Waste Systems, P.O. Box 4147, Hammond, Indiana, 46324, from Mr. Hert regarding the one-time disposal of one hundred and twenty (120) cubic yards of herbicide waste from E. **I.** DuPont DeNemours Company, Inc. at the GDC Landfill. Mr. Slager had previously requested permission to dispose of the herbicide waste at the GDC Landfill through a letter dated October 31, 1977. *[Obtain the October 31, 1977 letter and determine the exact nature of the particular herbicide.]*

October 20,1977

Messrs. Palin and King performed an inspection at the GDC Landfill at 2:00pm. Messrs. Palin and King observed two (2) violations, including open burning and failure to provide adequate layering and compaction of the solid waste. The inspection report noted that a fire was burning, but did not specify the origin nor location.

December 6,1977

A memorandum entitled, "Geologic Description and Evaluation" from Mr. Jim King of the Indiana State Board of Health was sent to the GDC public file. What follows is quoted directly from the "Evaluation and Recommendation" section of this memorandum.

ATTACHMENT E
Disposal of Herbicide from DuPont
November 1977

November 16, 1977

Mr. Wayne Slager
Calumet Waste Systems
P.O. Box 4147
Hammond, Indiana 46324

Dear Mr. Slager:

Re: Disposal of Herbicide from
DuPont, Incorporated

This will acknowledge receipt of your letter dated October 31, 1977, concerning the above-referenced subject.

You are hereby granted approval for the one-time only disposal of approximately 120 cubic yards of herbicide at the Gary Land Development Landfill, #45-2, Lake County.

Staff has contacted the State Chemist Office and they recommend disposal in a conventional landfill. Subsequently, the waste must be mixed with the general refuse and covered at the end of the working day. All necessary local approvals must be obtained prior to disposal.

If you have any questions, please contact Mr. Bruce Palin of the Solid Waste Management Section at AC 317/633-0176.

Very truly yours,

Oral H. Hert
Technical Secretary

BPalin/kad
cc: Gary Land Development Landfill
DuPont, Incorporated
Gary City Health Department

W19
F
11/16
nec

STATE of INDIANA

INDIANAPOLIS 46206

STREAM POLLUTION CONTROL BOARD

1330 West Michigan Street

May 13, 1980

Mr. Lawrence Hagen
479 North Cline Avenue
P.O. Box 6056
Gary, IN 46406

Dear Mr. Hagen:

Re: Disposal of Fly Ash from
Union Carbide Plant
4500 Kennedy Avenue
East Chicago, IN

This letter acknowledges the request for disposal dated March 25, 1980, from Mr. Dan McArdle of Industrial Disposal, Inc.

Approval is hereby granted for disposal of 15,000 yards of fly ash from the Union Carbide Plant at the Gary Land Development Sanitary Landfill, Lake County.

The approval is granted subject to the following conditions:

1. The generator and/or hauler must contact you to notify you of the time of disposal and conditions of shipment.

2. The fly ash shall not be placed in water.

3. The fly ash shall not be used for daily or final cover.

This approval will be revoked if the landfill fails to maintain compliance with 330 IAC 4-1, et. seq., (Regulation SPC 18). Any necessary local approval must be obtained from the City of Gary Health Department.

If you have any questions, please contact George Oliver of the Solid Waste Management Section at AC 317/633-0178.

Very truly yours,

Oral H. Hert

Oral H. Hert
Technical Secretary

GOliver/lb
cc: Industrial Disposal Corporation
Union Carbide, Inc.
City of Gary Health Department
Apc: Gary Landfill Development File

ATTACHMENT F
Sludge Load Analysis Sheet
General Drainage Feb 27, 1976

SLUDGE LOAD ANALYSIS SHEET

SOURCES OF MATERIAL General Drainage Inc. E.I. duPont DATE Feb. 27, 1976

WATER BASED _____ BURNABLE _____ OTHER Filter Aid

QUANTITY 80 cu. yds. per day GALS./WEEK/MONTH.

2010

WATER BASED

ph Moisture Fraction = 7.8

Viscosity Not measured

Solids:

Suspended 98.6%

Dissolved .4 %

Solution _____ Dispersion/Emulsion _____

Combined water as adherent.

BURNABLE+

Acid No. _____

Viscosity _____

Solids _____

Flash Point _____

(Tag Closed Cup Method)

Theoretical B.T.U. _____

Boiling Point:

Initial _____

Sustained _____

Terminal _____

Gas Chromatogram No H.C. as CH_4 I.R. Not run on water phase

Acid Base Titremetry Not applicable eq.

SOLIDS ANALYSIS:

Extractables 10 N. HCL gave small metal oxide concentration.

Ash $CaCO_3$ 91.4% SiO_2 5.2%

Metals Al+++ (21 ppm.) Ba (13 ppm) No Pb, Hg, Cd. Run by A.A.

COMMENTS: This residual filter cake material, is predominantly porous calcium carbonate, with small quantities of Al_2O_3, used in filtration of water based materials, thoroughly rinsed, prior to deposition. Minimum moisture concentration, would allow the classification of this material as a solid.

Work Done By Bill Petrich Approved By Bill Petrich

INDEPENDENT WASTE SYSTEMS, INC.
15th & Cline · P.O. Box 6218
GARY, INDIANA 46406

(219) 949-4275 or
(312) 375-6051

TO INDIANA STATE BOARD OF HEALTH
1330 W. Michigan Street
Indianapolis, Ind 46206

INDIANA STATE BOARD OF HEALTH
ENVIRONMENTAL ENGINEERING

DATE

FILE NO.

☐ URGENT
☐ SOON AS POSSIBLE
☐ NO REPLY NEEDED

ATTENTION Mr. George Dayhoff

SUBJECT 2-C-b

MESSAGE

Dear George: This is the analysis run by Mr. Bill Petrich on the filter cake material we propose to haul from E. I. Du Pont East Chicago to Gary Land Development. There will be approximately thirty yards a day of which 25% will be going to Gary Landfill and 75% going to Gary Atlas Cement to be reused. We would appreciate your thoughts on this subject. Sincerely,

SIGNED William Bogner

REPLY

DATE OF REPLY

SIGNED William Bogner

ATTACHMENT G
Lake County Health Dept. Letter
July 7, 1982

To: Schmidt
Mayson

LAKE COUNTY HEALTH DEPARTMENT

LAKE COUNTY GOVERNMENT CENTER
2293 NORTH MAIN STREET
CROWN POINT, INDIANA 46307
PHONE: 738-2020 OR 663-0760

PETER STECY M.D.
HEALTH COMMISSIONER

439

July 7, 1982

Gary Development Co. Inc.
Box 6056
Gary, Indiana 46406
Attention: Mr. Larry Hagen

Test data tabulated below were obtained for 3 samples of water from Sanitary Landfill 45 - 2 that were delivered to this laboratory on July 1, 1982.

Sample No.	pH	Chloride ppm	Chemical Oxygen Demand ppm	Total Hardness ppm	Total Iron ppm	Total Dissolved Solids ppm
1	8.1	400	240	400	5.0	1800
3	7.7	200	200	600	6.5	1000
5	8.4	100	70	120	0.0	1300

July 1982
Water Samples

Sincerely,

Andrew F. Livovich
C. Chemist

AFL/lr

#1 West Well By Vulcan
#2 North Well By Admixtures Plant - Dry - No Test
#3 South Well By River
#5 Well at Buildings 380' Deep

(1) inspecting landfills for the State of Indiana;

(2) inspecting landfills for private organizations;

(3) managing or operating landfills;

(4) working at landfills.

38. Is it a generally accepted practice by the State and/or its Inspectors not to place "cover" on a landfill until the end of the day when the landfill stops accepting wastes for that day?

(a) If the answer to the above question is yes, how can an Inspector determine at a period of time when a landfill is continuing to accept wastes, whether cover for that day is or will be adequately applied to the landfill? Discuss this answer in detail.

(b) If the answer to the main question contained in number 38 above is no:

(i) at what point in time does the State require that cover be applied?

(ii) cite any and all regulations, and refer to any and all documents establishing, relating to, and discussing such a requirement.

(c) Produce any and all documents relating to and/or discussing the time when cover is to be applied under Indiana law.

D. SPECIAL PERMISSION LETTERS:

39. We have in our possession the following "Special Permission Letters" (as used herein, the term "Special Permission Letters" refers to those letters issued by the State granting authority to dispose of hazardous or special wastes pursuant to 320 IAC 5-5-14) issued by the State to GDL:

Date	Waste Type	Waste Quantity
1/14/81	Fly Ash ✓	80,000 cubic yards for calendar year 1981

Date	Waste Type	Waste Quantity
1/9/81	Asbestos	50 cubic yards (one-time-only basis)
12/17/80	Pipe Insulating Asbestos Waste	300 cubic yards (one-time-only basis)
12/9/80	Metal Shavings	25 cubic yards per year
10/30/80	Asbestos Contaminated Material	700 cubic yards (one-time-only basis)
8/25/80	Asbestos	100 cubic yards (one-time-only basis)
5/14/80	Asbestos	40 cubic yards per week for four weeks; 20 cubic yards every other week thereafter
5/13/80	Fly Ash	15,000 cubic yards
11/27/79	Aluminum Dross (Milling Dust and Slag)	300 tons per day until June 15, 1980
3/20/79	Furnace Brick, Pallets	Unspecified
4/28/78	Water and Vegetable Oil	4,000 gallons (one-time-only basis)
11/18/77	Herbicide	120 cubic yards (one-time-only basis)
9/6/77	Oily Waste From 6-Stand Oil Recovery Unit	1,200 gallons per day
7/22/77	Filter Cake Kiln Scrubber Mud	1,500 pounds per week 3,000 pounds per week
6/3/77	API Separator Bottoms	200 cubic yards per year
6/1/77	Lime Sludge	80,000 gallons per month (not more than 4,000 gallons per day)
5/17/77	Asbestos Paper	105 cubic yards per week
5/12/77	Filter Cake Scrubber Mud	1,500 pounds per week 3,000 pounds per week (Temporary Approval)
4/25/77	Activated Biological Sludge	Unspecified
3/14/77	Calcium Sulfate	1.5 tons per day
3/14/77	Lime Waste	80,000 gallons per month
3/4/77	Youngstown Oil Sludge	Unspecified
10/7/76	Gypsum Wastes (ph 7.9)	Quantity Unspecified
10/4/76	Calcium Carbonate	30 cubic yards per day
4/12/76	Paint Sludges	25 cubic yards per day
2/20/76	Corn Starch and Carbon Filters	Unspecified

Date	Waste Type	Waste Quantity
1/30/76	Lime Slurry	1,500 to 5,000 gallons per week
6/18/75	Neutralized Sludges	Temporary Approval
2/24/75	Dripolene	4 to 5 truckloads per week for 6 months

(a) Are the Special Permission Letters outlined above the only such letters issued by the State granting permission to any person or company to dispose of hazardous or special wastes at GDL? If not, list all other such letters and their date; specify the type of waste involved; identify whether such waste is an industrial waste, a RCRA hazardous waste, or both; and produce copies of such letters and all documents relating thereto.

(b) Has the State ever orally granted special permission to dispose of special or hazardous waste at GDL and not followed up on such oral approval with a letter? If so, state the date of such approval; the generator and type of waste involved; and the amount and duration of the waste permitted to be disposed of.

(c) Admit or deny that the above chart accurately sets forth the Special Permission Letters granted to GDL, and the type, amount, and duration of the disposal of such wastes. If you deny this statement, specify the inaccuracies, and set forth, in detail, a correct replacement chart.

(d) Admit or deny that the State could not and would not issue the above Special Permission Letters unless it determined that disposal of such wastes at GDL would not pose an unreasonable risk of harm to the environment or health of the citizens of Indiana.

(e) If Respondent denies subpart (d) above, then state in detail under what conditions the Board would issue a Special Permission Letter knowing that disposal pursuant to said letter would pose an unreasonable risk of harm to the environment or health of the citizens of Indiana.

f. Youngstown Sheet and Tube	Oil sludge	Interim approval 3/2/77
g. U.S. Steel	Wastewater sludge	Interim approval 3/3/77

4. That the Respondent, Gary Land Development, shall pay a civil penalty in the amount of $1,000 to the Environmental Management Special Fund, as provided by IC 13-7-13.

5. That the Stream Pollution Control Board of the State of Indiana agrees to withdraw this action upon compliance with the above terms.

GARY LAND DEVELOPMENT LAKE COUNTY, INDIANA	STREAM POLLUTION CONTROL BOARD OF THE STATE OF INDIANA
By: _____	By: _____
Title: _____	Title: _____
Date: _____	Date: _____

these improper practices were observed, the potential environmental problems associated with said practices, and produce all documents relating to this Interrogatory.

44. GDL received permission to accept the following listed wastes:

Waste Type	Permission Letter Date	Amount Allowed
API Separator Bottoms	6/3/77	200 cubic yards
Paint Sludges	4/12/76	25 cubic yards
Solid Corn Starch	2/20/76	Unspecified
Carbon Filters from Corn Syrup Filtering Processes	2/20/76	Unspecified
Lime Sludges	6/1/77	80,000 gallons per month or 4,000 gallons per day
Lime Waste	3/14/77	80,000 gallons per month
Calcium Carbonate	10/4/76	30 cubic yards per day
Lime Sludge	1/30/76	1,500 to 5,000 gallons per week
Activated Biological Sludge	4/25/77	Unspecified
Calcium Sulfate	3/14/77	1.5 tons per day
Gypsum Wastes (no Cd or Pb)	10/7/76	Unspecified

For each of the above-mentioned wastes, answer the following questions:

(a) Admit or deny that permission was received by GDL to receive this waste.

(b) Is each waste listed an industrial waste, a RCRA hazardous waste, or both? Cite the authority for, and the regulations supporting, this categorization.

(c) Admit or deny that the above approvals to accept each waste listed were given on a continuing basis? If you deny this statement, discuss your response in detail.

(d) For each waste identified above, discuss in detail the anticipated adverse environmental impacts of continued disposal of these material at GDL.

4. That the Respondent, Gary Land Development, discharged contaminated water, consisting of leachate from the landfill and ground water containing heavy metals and oils which flowed into the landfill, into the Grand Calumet River on or about August 27, 1976, in violation of Stream Pollution Control Board Regulations SPC 1S and SPC 1R-3.

5. That the Respondent, Gary Land Development, accepted liquids, sludges and other hazardous wastes during the months of October, November and December 1976, in violation of Stream Pollution Control Board Regulation SPC 18.

6. That the Respondent, Gary Land Development, has failed to construct and operate the site as per Stream Pollution Control Board approval SW 133; more particularly by the failure to operate the landfill in lifts and failure to construct a clay perimeter around the site.

WHEREFORE, upon consent of the parties as aforesaid, it is hereby:

ORDERED, ADJUDGED AND DECREED as follows:

1. That the provisions of this Order shall apply to Gary Land Development its agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting through or for them.

2. That the Respondent, Gary Land Development, shall submit revised plans to address the problems associated with the presence of contaminated ground water flowing into the site. Further, such plans shall include leachate treatment and/or disposal and exterior drainage of contaminated groundwater flowing into the site. Plans shall be submitted within 60 days of the effective date of this Order. Construction will commence within 30 days after Stream Pollution Control Board approval and construction will be complete within 90 days after commencement of construction.

3. That the Respondent, Gary Land Development, shall accept liquids, semi-liquids or sludges only as approved by the Stream Pollution Control Board. The Respondent presently has approval to receive liquid, semi-liquids or sludges from the following:

Company	Waste Material	Date of Approval
a. Union Carbide	Lime, sludge (1500-5000 gallons/week)	1/30/76
b. American Maize Products Company	Corn starch and carbon filters	2/20/76
c. American Chemical Service	Paint sludge (25 cu. yds./day)	4/12/76
d. E. I. duPont	Calcium Carbonate (30 cu. yds./day)	10/4/76
e. U.S. Reduction	Salt recovery plant sludge cake	6/16/76

Company	Waste Material	Date of Approval
a. Union Carbide	Lime, sludge (1500-5000 gallons/week)	1/30/76
b. American Maize Products Company	Corn starch and carbon filters	2/20/76
c. American Chemical Service	Paint sludge (25 cu. yds./day)	4/12/76
d. E. I. duPont	Calcium Carbonate (30 cu. yds./day)	10/4/76
e. U.S. Reduction	Salt recovery plant sludge cake	6/16/76
f. Youngstown Sheet and Tube	Oil sludge	Interim approval 3/2/77
g. U.S. Steel	Wastewater sludge	Interim approval 3/3/77

ATTACHMENT H
EPA Form T2070-4
March 10, 1980

EPA

POTENTIAL HAZARDOUS WASTE SITE
TENTATIVE DISPOSITION

REGION	SITE NUMBER
V	

File this form in the regional Hazardous Waste Log File and submit a copy to U.S. Environmental Protection Agency, Site Tracking System, Hazardous Waste Enforcement Task Force *(EN-335)*, 401 M St., SW, Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET	
Gary Development Landfill	Gary & Cline Aves	
C. CITY	**D. STATE**	**E. ZIP CODE**
Gary	IN	46406

II. TENTATIVE DISPOSITION

Indicate the recommended action(s) and agency(ies) that should be involved by marking 'X' in the appropriate boxes.

RECOMMENDATION	MARK 'X'	ACTION AGENCY: EPA	STATE	LOCAL	PRIVATE
A. NO ACTION NEEDED -- NO HAZARD					
B. INVESTIGATIVE ACTION(S) NEEDED *(If yes, complete Section III.)*	X	X			
C. REMEDIAL ACTION NEEDED *(If yes, complete Section IV.)*	X		X		
D. ENFORCEMENT ACTION NEEDED *(If yes, specify in Part E whether the case will be primarily managed by the EPA or the State and what type of enforcement action is anticipated.)*					

E. RATIONALE FOR DISPOSITION

State is currently involved in/planning a remedial action. EPA will monitor progress of this and assure its adequacy for RCRA purposes.

F. INDICATE THE ESTIMATED DATE OF FINAL DISPOSITION *(mo., day, & yr.)*	G. IF A CASE DEVELOPMENT PLAN IS NECESSARY, INDICATE THE ESTIMATED DATE ON WHICH THE PLAN WILL BE DEVELOPED *(mo., day, & yr.)*

H PREPARER INFORMATION

1 NAME	2 TELEPHONE NUMBER	3 DATE *(mo., day, & yr.)*
Richard A. Shandross	312 886-6146	3/10/80

III. INVESTIGATIVE ACTIVITY NEEDED

A IDENTIFY ADDITIONAL INFORMATION NEEDED TO ACHIEVE A FINAL DISPOSITION.

Tracking of State activity.

B PROPOSED INVESTIGATIVE ACTIVITY *(Detailed Information)*

1 METHOD FOR OBTAINING NEEDED ADDITIONAL INFO.	2 SCHEDULED DATE OF ACTION *(mo, day, & yr)*	3. TO BE PERFORMED BY *(EPA, Contractor, State, etc.)*	4 ESTIMATED MANHOURS	5 REMARKS
a. TYPE OF SITE INSPECTION (1) General	Not sched yet	EPA	8	Points of State Agreed Order should be assured to be valid, and any other points noted
(2)				
(3)				
b. TYPE OF MONITORING (1)				
(2)				
c. TYPE OF SAMPLING (1)				
(2)				

EPA Form T2070-4 (10-79)

Continue On Reverse

Continued From Front

III. INVESTIGATIVE ACTIVITY NEEDED and PART B - PROPOSED INVESTIGATIVE ACTIVITY *(Continued)*

d. TYPE OF LAB ANALYSIS (1)				
(2)				
e. OTHER *(specify)* (1)				
(2)				

C. ELABORATE ON ANY OF THE INFORMATION PROVIDED IN PART B *(on front & above)* AS NEEDED TO IDENTIFY ADDITIONAL INVESTIGATIVE WORK.

D. ESTIMATED MANHOURS BY ACTION AGENCY

1 ACTION AGENCY	2. TOTAL ESTIMATED MANHOURS FOR INVESTIGATIVE ACTIVITIES	1 ACTION AGENCY	2. TOTAL ESTIMATED MANHOURS FOR INVESTIGATIVE ACTIVITIES
a. EPA	8	b. STATE	
c. EPA CONTRACTOR		d. OTHER *(specify)*	

IV. REMEDIAL ACTIONS

A. SHORT TERM/EMERGENCY STRATEGY *(On Site & Off-Site)* List all emergency actions needed to bring site under immediate control, e.g., restrict access, provide alternate water supply, etc. See instructions for a list of Key Words for each of the actions to be used in the space below.

1. ACTION	2. EST. START DATE *(mo,day,&yr)*	3 EST. END DATE *(mo,day,&yr)*	4. ACTION AGENCY *(EPA, State, Private Party)*	5 ESTIMATED COST	6 SPECIFY 311 OR OTHER ACTION, INDICATE THE MAGNITUDE OF THE WORK REQUIRED
				$	
				$	
				$	
				$	
				$	
				$	

B. LONG TERM STRATEGY *(On Site & Off-Site)* List all long term solutions, e.g., excavation, removal, ground water monitoring wells, etc. See instructions for a list of Key Words for each of the actions to be used in the spaces below.

1. ACTION	2 EST. START DATE *(mo,day,&yr)*	3. EST. END DATE *(mo,day,&yr)*	4. ACTION AGENCY *(EPA, State Private Party)*	5. ESTIMATED COST	6 SPECIFY 311 OR OTHER ACTION, INDICATE THE MAGNITUDE OF THE WORK REQUIRED
				$	
				$	
				$	
				$	
				$	
				$	

C ESTIMATED MANHOURS AND COST BY ACTION AGENCY

1 ACTION AGENCY	2. TOTAL EST. MANHOURS FOR REMEDIAL ACTIVITIES	3 TOTAL EST COST FOR REMEDIAL ACTIVITIES	1 ACTION AGENCY	2 TOTAL EST MANHOURS FOR REMEDIAL ACTIVITIES	3 TOTAL EST. COST FOR REMEDIAL ACTIVITIES
a. EPA			b STATE		
c. PRIVATE PARTIES			d. OTHER *(specify)*		

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	D077005916

II WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- ■ A SOLID
- ■ B POWDER FINES
- ■ C SLUDGE
- ☐ D OTHER _____ (Specify)
- ☐ E SLURRY
- ■ F LIQUID
- ☐ G GAS

02 WASTE QUANTITY AT SITE
(Measures of waste quantities must be independent)

TONS _____
CUBIC YARDS 97,680
NO OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- ■ A TOXIC
- ■ B CORROSIVE
- ☐ C RADIOACTIVE
- ■ D PERSISTENT
- ■ E SOLUBLE
- ☐ F INFECTIOUS
- ■ G FLAMMABLE
- ■ H IGNITABLE
- ■ I HIGHLY VOLATILE
- ☐ J EXPLOSIVE
- ☐ K REACTIVE
- ☐ L INCOMPATIBLE
- ☐ M NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	unk		oil sludge sludges lime, paint and activated biological
OLW	OILY WASTE	1,200	gallons/day	
SOL	SOLVENTS	unk		*see attached Sheets
PSD	PESTICIDES	120	Cu. yds.	Herbicide
OCC	OTHER ORGANIC CHEMICALS	unk		
IOC	INORGANIC CHEMICALS	unk		asbestos; flyash
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	unk		Aluminum Dross (Milling dust and slag)

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI SOURCES OF INFORMATION (Cite specific references e.g. state files, sample analysis, reports)

Indiana State Board of Health files & inspection reports at the Division of Land Pollution Control, Indianapolis
US EPA Erris file, Region II, Chicago

EPA FORM 2070-12 (7-81)

Continued From Front

III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (sources of waste)

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED
US Reduction	(219) 397-9000	4610 Kennedy, E. Chicago, IN	Al_2O_3 sludge
US Steel	(219) 9942000	/ N. Broadway, Gary, IN	"Terminal treatment sludge
Youngstown Sheet & Tube	~~(219)~~ (219) 397-2000	3001 Dickey, E. Chicago, IN	Oily waste

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED
City of Hammond	(219) 853-6433	5911 Calumet Hammond IN	Municipal
Industrial Disposal Corp	(219) 397-2669	2000 Gary Road E. Chicago, IN	"Terminal treatment sludge"
Calumet Waste Systems	(219) 932-2790	7337 W. 5th Ave Gary, IN	O.K.

F. IF WASTE IS PROCESSED ON SITE AND ALSO SHIPPED TO OTHER SITES, IDENTIFY OFF-SITE FACILITIES USED FOR DISPOSAL.

1. NAME	2. TELEPHONE NO.	3. ADDRESS

G. DATE OF INSPECTION (mo., day & yr.)	H. TIME OF INSPECTION	I. ACCESS GAINED BY (credentials must be shown in all cases)
2/25/80	11:49 am	☒ 1. PERMISSION ☐ 2. WARRANT

J. WEATHER (describe)
Cloudy, below freezing

IV. SAMPLING INFORMATION

A. Mark 'X' for the types of samples taken and indicate where they have been sent e.g., regional lab, other EPA lab, contractor, etc. and estimate when the results will be available.

1. SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3. SAMPLE SENT TO:	4. DATE RESULTS AVAILABLE
a. GROUNDWATER			
b. SURFACE WATER			
c. WASTE			
d. AIR			
e. RUNOFF			
f. SPILL			
g. SOIL			
h. VEGETATION			
i. OTHER (specify)			

B. FIELD MEASUREMENTS TAKEN (e.g., radioactivity, explosivity, PH, etc.)

1. TYPE	2. LOCATION OF MEASUREMENTS	3. RESULTS

EPA Form T2070-3 (10-79)

Continued From Page 2

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS: [X] a. GROUND [X] b. AERIAL (another date)

2. PHOTOS IN CUSTODY OF: Richard A. Shandross

D. SITE MAPPED?

[ ] YES SPECIFY LOCATION OF MAPS

E. COORDINATES

1. LATITUDE (deg.-min.-sec.): OK

2. LONGITUDE (deg.-min.-sec.): OK

V. SITE INFORMATION

A. SITE STATUS

[X] 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)

[ ] 2. INACTIVE (Those sites which no longer receive wastes.)

[ ] 3. OTHER (specify): _____ (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

[X] 1. NO [ ] 2. YES (specify generator's four-digit SIC Code) _____

C. AREA OF SITE (in acres): 62

D. ARE THERE BUILDINGS ON THE SITE?

[ ] 1. NO [X] 2. YES (specify). Office

VI. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

X	A. TRANSPORTER	X	B. STORER	X	C. TREATER	X	D. DISPOSER
	1. RAIL		1. PILE		1. FILTRATION	X	1. LANDFILL
	2. SHIP		2. SURFACE IMPOUNDMENT		2. INCINERATION		2. LANDFARM
	3. BARGE		3. DRUMS		3. VOLUME REDUCTION		3. OPEN DUMP
	4. TRUCK		4. TANK, ABOVE GROUND		4. RECYCLING/RECOVERY		4. SURFACE IMPOUNDMENT
	5. PIPELINE		5. TANK, BELOW GROUND		5. CHEM./PHYS./TREATMENT		5. MIDNIGHT DUMPING
	6. OTHER (specify)		6. OTHER (specify)		6. BIOLOGICAL TREATMENT		6. INCINERATION
					7. WASTE OIL REPROCESSING		7. UNDERGROUND INJECTION
					8. SOLVENT RECOVERY		8. OTHER (specify):
					9. OTHER (specify)		

E. SUPPLEMENTAL REPORTS If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this for..

[ ] 1. STORAGE [ ] 2. INCINERATION [X] 3. LANDFILL [ ] 4. SURFACE IMPOUNDMENT [ ] 5. DEEP WELL

[ ] 6. CHEM/BIO/PHYS TREATMENT [ ] 7. LANDFARM [ ] 8. OPEN DUMP [ ] 9. TRANSPORTER [ ] 10. RECYCLOR/RECLAIMER

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

[X] 1. LIQUID [X] 2. SOLID [X] 3. SLUDGE [ ] 4. GAS

B. WASTE CHARACTERISTICS

[ ] 1. CORROSIVE [ ] 2. IGNITABLE [ ] 3. RADIOACTIVE [ ] 4. HIGHLY VOLATILE

[X] 5. TOXIC [X] 6. REACTIVE [ ] 7. INERT [X] 8. FLAMMABLE

9. OTHER (specify)

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Yes. Board of Health Records, facility records.

Continued From Front

VII. WASTE RELATED INFORMATION (continued)

2. Estimate the amount (specify unit of measure) of waste by category, mark 'X' to indicate which wastes are present

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT: 84430	AMOUNT: 680,000	AMOUNT:	AMOUNT: 34450	AMOUNT: 1260	AMOUNT: 4720
UNIT OF MEASURE: ton	UNIT OF MEASURE: gallon	UNIT OF MEASURE:	UNIT OF MEASURE: ton	UNIT OF MEASURE: yd^3	UNIT OF MEASURE: yd^3
X (1) PAINT PIGMENTS	X (1) OILY WASTES	X (1) HALOGENATED SOLVENTS	X (1) ACIDS	X (1) FLYASH	X (1) LABORATORY PHARMACEUT
X (2) METALS SLUDGES	(2) OTHER (specify)	(2) NON-HALOGNTD SOLVENTS	(2) PICKLING LIQUORS	X (2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify)	(3) CAUSTICS	(3) MILLING/MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMELTING WASTES	(4) MUNICIPAL
X (5) OTHER (specify)			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	X (5) OTHER (specify)
Al_2O_3 Sludge			(6) CYANIDE	(6) OTHER (specify)	"API Separator bottoms"
lime sludge			(7) PHENOLS		corn starch
WWTP (bacteria) "			(8) HALOGENS		carbon filters
kiln scrubber "			(9) PCB		"lime waste"
sludge from steel mill treatment plants			(10) METALS		filter cake from metals plant
			X (11) OTHER (specify) $CaCl_2$ $CaSO_4$ Herbicides		unknown amount of garbage

D. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (~~Place in descending order of hazard~~)

1. SUBSTANCE (Absolute standpoint)	2. FORM (mark 'X') a. SOLID	b. LIQ.	c. VAPOR	3. TOXICITY (mark 'X') a. HIGH	b. MED	c. LOW	d. NONE	4. CAS NUMBER	5. AMOUNT	6. UNIT
Al_2O_3 dross	X								4.0 *	mill. pounds
Oily waste		X							1.09 *	mill. Gallons
Herbicides	DK								DK *	
"API Separator bottoms"	DK								600 *	yd^3
Asbestos	X								15,000 *	yd^3
				X					Data from Board of Health records, however it is stated in "amount/time" "Yard disposal may be less, or may have stopped. (as an approval)	

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

☐ A. HUMAN HEALTH HAZARDS

Continued From Page 4

VIII. HAZARD DESCRIPTION (continued)

☐ B. NON-WORKER INJURY/EXPOSURE

☒ C. WORKER INJURY/EXPOSURE

Reaction of Al_2O_3 with garbage to form heat and fumes (ammonia-like smell)

☐ D. CONTAMINATION OF WATER SUPPLY

☐ E. CONTAMINATION OF FOOD CHAIN

☐ F. CONTAMINATION OF GROUND WATER

☒ G. CONTAMINATION OF SURFACE WATER

Sump has been illegally discharged to Grand Calumet River.

VIII. HAZARD DESCRIPTION (continued)

☒ H. DAMAGE TO FLORA/FAUNA

along river. See (G.) and note that State Agreed Order includes point to "eliminate leachate to river." draft

☐ I. FISH KILL

☒ J. CONTAMINATION OF AIR

see C.

☒ K. NOTICEABLE ODORS

see C.

☐ L. CONTAMINATION OF SOIL

☒ M. PROPERTY DAMAGE

Continued From Page 6

VIII. HAZARD DESCRIPTION (continued)

[X] N. FIRE OR EXPLOSION

Barrels have exploded in past, however policy is now to not accept them. Heat is evolved from reaction of aluminum dross with garbage.

[ ] O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID

[ ] P. SEWER, STORM DRAIN PROBLEMS

[X] Q. EROSION PROBLEMS

Clay wall, artificially erected by operators, has fallen down in several places due to groundwater head.

[ ] R. INADEQUATE SECURITY

[X] S. INCOMPATIBLE WASTES

See C.

VIII. HAZARD DESCRIPTION (continued)

☐ T. MIDNIGHT DUMPING

☐ U. OTHER (specify)

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO. OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS				
2. IN COMMERCIAL OR INDUSTRIAL AREAS	unknown	→		
3. IN PUBLICLY TRAVELLED AREAS				
4. PUBLIC USE AREAS (parks, schools, etc.)				

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit)	B. DIRECTION OF FLOW	C. GROUNDWATER USE IN VICINITY
several feet	Probably N to S	None
D. POTENTIAL YIELD OF AQUIFER	**E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure)**	**F. DIRECTION TO DRINKING WATER SUPPLY**
OK	~2 mile	NNE

G. TYPE OF DRINKING WATER SUPPLY

☐ 1. NON-COMMUNITY < 15 CONNECTIONS*

☒ 2. COMMUNITY (specify town) > 15 CONNECTIONS — Gary

☒ 3. SURFACE WATER

☐ 4. WELL

Continue On Page 9

Continued From Page 8

X. WATER AND HYDROLOGICAL DATA (continued)

H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COMMUNITY (mark 'X')	5. COMMUNITY (mark 'X')
	None			

I. RECEIVING WATER

1. NAME: Grand Calumet

☐ 2. SEWERS ☒ 3. STREAMS/RIVERS ☐ 4. LAKES/RESERVOIRS ☐ 5. OTHER (specify):

6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS

OK

XI. SOIL AND VEGITATION DATA

LOCATION OF SITE IS IN

☐ A. KNOWN FAULT ZONE ☐ B. KARST ZONE ☒ C. 100 YEAR FLOOD PLAIN (right next to river) ☐ D. WETLAND

☐ E. A REGULATED FLOODWAY ☐ F. CRITICAL HABITAT ☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER

XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

'X'	A. OVERBURDEN	'X'	B. BEDROCK (specify below)	'X'	C. OTHER (specify below)
X	1. SAND 0'-35'				
X	2. CLAY at 35'				
	3. GRAVEL				

XIII. SOIL PERMEABILITY

☒ A. UNKNOWN ☐ B. VERY HIGH (100,000 to 1000 cm/sec.) ☐ C. HIGH (1000 to 10 cm/sec.)

☐ D. MODERATE (10 to .1 cm/sec.) ☐ E. LOW (.1 to .001 cm/sec.) ☐ F. VERY LOW (.001 to .00001 cm/sec.)

G. RECHARGE AREA

☐ 1. YES ☐ 2. NO 3. COMMENTS:

H. DISCHARGE AREA

☐ 1. YES ☐ 2. NO 3. COMMENTS

I. SLOPE

1. ESTIMATE % OF SLOPE: OK

2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.

J. OTHER GEOLOGICAL DATA

Continued From Front

XIV. PERMIT INFORMATION

List all applicable permits held by the site and provide the related information.

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X') 1. YES	2. NO	3. UNKNOWN
State, landfill	ISBH	SW133, OPP 45-2 Pending	?	3/1/81		X	

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS

☐ NONE ☒ YES (summarize in this space)

State is involved in attempting to correct problems through consent agreement.

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition (Section II) information on the first page of this form.

LANDFILLS SITE INSPECTION REPORT
(Supplemental Report)

INSTRUCTION
Answer and Explain as Necessary

1. EVIDENCE OF SITE INSTABILITY (Erosion, Settling, Sink Holes, etc)
[X] YES [ ] NO Gulley on west side.

2 EVIDENCE OF IMPROPER DISPOSAL OF BULK LIQUIDS, SEMI-SOLIDS AND SLUDGES INTO THE LANDFILL
[ ] YES [X] NO

3. CHECK RECORDS OF CELL LOCATION AND CONTENTS AND BENCHMARK
[ ] YES [X] NO

4. WASTES SURROUNDED BY SORBENT MATERIAL
[ ] YES [ ] NO unknown

5. DIVERSION STRUCTURES ARE EFFECTIVELY CONSTRUCTED AND PROPERLY MAINTAINED
[ ] YES [ ] NO unknown

6. EVIDENCE OF PONDING OF WATER ON SITE
[X] YES [ ] NO Intentional — drainage trench which leads to sump.

7. EVIDENCE OF IMPROPER/INADEQUATE DRAINING
[ ] YES [X] NO

8. ADEQUATE LEACHATE COLLECTION SYSTEM (If "Yes", specify Type)
[ ] YES [ ] NO unknown

8a. SURFACE LEACHATE ~~SEEPS~~
[X] YES [ ] NO on west side, leachate was seen in aerial photo of early 1980.

9. RECORDS OF LEACHATE ANALYSIS
[X] YES [ ] NO by EPA contractor, 9/8/76

10. GAS MONITORING
[ ] YES [X] NO

11. GROUNDWATER MONITORING WELLS
[ ] YES [ ] NO unknown

12. ARTIFICIAL MEMBRANE LINER INSTALLED
[ ] YES [X] NO

13. SPECIFIC CONTAINMENT MEASURES (Clay Bottom, Sides, etc)
[X] YES [ ] NO however inadequate since clay has fallen down in places

14. FIXATION (Stabilization) OF WASTE
[X] YES [ ] NO Addition of ~~soil~~ lime or polymers and water to waste ash

15. ADEQUATE CLOSURE OF INACTIVE PORTION OF FACILITY
[ ] YES [X] NO (as can be seen)

16. COVER (Type)
1 ft clay

16a. THICKNESS
1 ft

16b. PERMEABILITY
OK:

16c. DAILY APPLICATION
YES [ ] NO
unknown

EPA **Notification of Hazardous Waste Site**

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

IN #37 INS-000-001-092

A Person Required to Notify:
Enter the name and address of the person or organization required to notify.

Name: GARY DEVELOPMENT LAURENCE HAGEN
Street: P.O. BOX 6056
City: GARY State: IND Zip Code: 46406

B Site Location: IND077005916
Enter the common name (if known) and actual location of the site.
IND. EPA. Permit 45-2

Name of Site: GARY DEVELOPMENT CO. INC.
Street: CLINE AND GARY AVE. EAST OF CLINE N. OF RIVER
City: GARY County: LAKE State: IND Zip Code: 46406

C Person to Contact:
Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): HAGEN, LAWRENCE V.P. GEN. MGR.
Phone: 219-944-7858

D Dates of Waste Handling:
Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1976 To (Year): 1981

E Waste Type: Choose the option you prefer to complete

Option I: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

F006 electroplating sl[illegible]		
K087 tank tar sludge		

000040 JUN -5 81

US EPA RECORDS CENTER REGION 5
415016

JUN 05 1981

Form Approved
OMB No. 2000-0138

EPA Form 8900-1

Notification of Hazardous Waste Site Site two

F Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☒ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☐ Other (Specify) _____

Total Facility Waste Amount

cubic yds 97,680 cu. yds

gallons _____

Total Facility Area

square feet _____

acres 62 ACRES

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☒ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name GARY DEVELOPMENT, LAWRENCE HOGER

Street P.O. Box 6056

City Gary State IND Zip Code 46406

Signature Lawrence H. Hoger Date 6-4-81

☒ Owner, Present
☐ Owner, Past
☐ Transporter
☒ Operator, Present
☐ Operator, Past
☐ Other

USEPA # IND. 077 005 916 Permit # IND 45-2

CERCLA III B

EPA Notification of Hazardous Waste Site

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

IN-8

810609

IN# 218

INS-000-001-090

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name INDIANA WASTE SYSTEMS, INC.

Street P.O. Box 250

City Valparaiso State IN Zip Code 46368

B Site Location:

Enter the common name (if known) and actual location of the site.

IND 077005916

Name of Site GARY DEVELOPMENT LANDFILL *

Street 479 N. Cline Ave.

City Gary County Lake State IN Zip Code 46406

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Diver, Jeffrey - Envir. Counsel

Phone 312/654-8800

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) 1972 To (Year) ~~PRESENT~~ 1981

E Waste Type: *Choose the option you prefer to complete*

Option I: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste: Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☒ Organics
2. ☒ Inorganics
3. ☒ Solvents
4. ☐ Pesticides
5. ☒ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☒ Mixed Municipal Waste
10. ☒ Unknown
11. ☒ Other (Specify)

INCINERATOR RESIDUES
OIL SLUDGE

Source of Waste: Place an X in the appropriate boxes.

1. ☐ Mining
2. ☒ Construction
3. ☐ Textiles
4. ☒ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☒ Iron/Steel Foundry
8. ☒ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☒ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☒ Lab/Hospital
17. ☒ Unknown
18. ☒ Other (Specify)

REFINERY

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste: EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

* SITE OWNER/OPERATOR ASSERTS THIS FACILITY IS ON INTERIM STATUS. USEPA, REGION V, PERSONNEL HAVE ADVISED US, HOWEVER, THAT SITE DOES NOT HAVE INTERIM STATUS, ALTHOUGH A PART 'A' APPLICATION WAS FILED.

000370 IN-981

Form Approved
OMB No. 2000-0138
EPA Form 8900-1

JUN 12 1981

Notification of Hazardous Waste Site — Side Two

F Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☒ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☒ Drums, Below Ground
9. ☐ Other (Specify) _____

Total Facility Waste Amount

cubic feet ~~UNKNOWN~~

gallons

Total Facility Area

square feet

acres 80 A

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☒ Suspected ☐ Likely ☐ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

Environmental Counsel has prepared this form, based upon composite information provided in written and oral responses from employees of the reporting company, much of which may have been founded in hearsay, rumor, speculation and imperfect recollection of past events. No admission or representation is therefore made that any of the wastes handled by this company, or generically reported on this form, would actually meet a listed discription or characteristic of "hazardous waste" at 50 CFR, Part 261. Where a "facility waste amount" is indicated, it is, in most cases, a very crude estimation of "potentially hazardous waste," as in most cases, no records of waste types or quantities were available. If the reporting company is a "transporter," no representation is made that the company selected the reported site, nor that all of the waste types indicated were actually transported by the reporting company.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name W. Brand Bobosky, Asst. Secretary

Street 900 Jorie Boulevard

City Oak Brook State IL Zip Code 60521

Signature W. Brand Bobosky Date 6/9/81

☐ Owner, Present
☐ Owner, Past
☒ Transporter
☐ Operator, Present
☐ Operator, Past
☐ Other

ATTACHMENT I

GENERATORS

Jones and Laughlin Steel Company, East Chicago
Union Carbide, East Chicago
American Maize Products Company
American Chemical Service
E. I. DuPont
U. S. Reduction
Youngstown Sheet and Tube, East Chicago
U. S. Steel
Calumet Waste Systems
Vulcan Materials Company Company, Gary
Energy Cooperative, Inc., East Chicago
Industrial Rubbish Removal
U. S. S. Lead Refinery, Inc.
C. F. Petroleum
Lever Brothers Company
Conservation Chemical Company
Industrial Disposal
General Drainage
Calumet Wastes, Inc.
Independent Waste
City of Hammond
Amoco Oil Company, Whiting
Standard Steel Speciality Company, Hammond
Cities Services Refinery, Gary
Former Ashland Chemical Plant, Hammond
Borg - Warner, Bellwood, Illinois
Georgia Pacific
Shell Oil Refinery
Brandenberg Demolition

12/21/83

ATTACHMENT I
Letter from Paul Hess
January 24, 1984

DATE: January 24, 1984
TO: File
FROM: Paul Hess
SUBJECT: Indiana/R05-8307-04-085
Gary/Gary Development, Inc. - On-site Inspection

Attached is an on-site inspection report (Form 2070-13), a site sketch, a partial topographic map, an aerial reproduction, and ground level photos. The above items were produced as a result of the on-site inspection conducted by FIT on December 27 and 28, 1983. During this inspection, the FIT collected three (3) sets of low concentration water samples. Two (2) of these sets were obtained from on-site monitoring wells (No. 1 and 2), and the third set was taken from the west side drainage ditch (see site sketch).

The Gary Development, Inc. facility is an active sanitary landfill that is operating under Indiana State Board of Health Permit Number 45-2. This facility was constructed in an abandoned, water filled, sand quarry that lies adjacent to the Grand Calumet River in northeastern Indiana. The current operator of this site obtained a sanitary landfill construction permit, from the state agency that required the dewatering of this quarry, the lining of the sidewalls with clay, the emplacement of two clay barrier walls (west and south), the installation of a leachate collection system, and the emplacement of four perimeter monitoring wells. The construction was completed and passed state inspection before the operator began accepting solid waste for disposal in September, 1974. It should be noted that after the operating permit was issued in 1975, the State Board of Health began questioning the adequacy of the aforementioned systems at this facility.

The construction of the above systems at this site has created an artificially induced low water table under this site. The water table is depressed about thirty (30) feet. This depression may be causing the surrounding groundwater to seep into this site through the clay liner. This possible seepage along with leachate from disposed waste and precipitation runoff are collected and discharged from the site. Therefore, the leachate collection system maintains this depressed water table. The possibility that hazardous waste deposited at this site might migrate off site via the natural groundwater flow is remote. However, once the facility is closed and the on-site water table is allowed to recover from this negative influence, the question of hazardous waste migration via the groundwater route will have to be reassessed. Therefore, the adequacy of this site's clay liner will have to be evaluated before the site is closed.

The source or sources of any contaminated groundwater found at or near this site becomes a complex problem because there are twelve (12) alleged or known hazardous waste sites within a two (2) mile radius. Five (5) of these sites border the perimeter of this landfill. These sites are Vulcan Material Metal Division surface impoundment (west perimeter), City Service refinery tank bottom dump (northwest perimeter), Conservation Chemical surface impoundments (northeast perimeter), Gary Airport Dump (east perimeter), Grand Calumet River (south perimeter), Cliff Rolland Dump (northeast), 9th Avenue Dump (south), Midco II (south), Midco II (northeast), unnamed dump (adjacent to south side of river), and the City of Gary Landfill (south). See partial topographic map for detailed location.

The liquid waste from the leachate collection system was discharged to the Grand Calumet River for a number of years without an NPDES permit. This practice was stopped by the operator as a result of a 1983 consent decree settlement with the state. Since that settlement,

the operator has been mixing the liquid leachate with lime and fly ash to form a rock like cover material. The lime mix forms a hydrated calcium carbonate that traps the leachate impurities.

Gary Development has petitioned for and received approval from the State Board of Health to accept a number of industrial wastes. Some of these industrial wastes are considered hazardous waste. These industrial wastes contain varying amounts of hazardous compounds. Some of these hazardous compound types are heavy metals, asbestos, inorganic acids and bases, and oils. A list of the waste types and waste quantities is documented in the consent decree settlement between the two parties.

The subject facility is one of three (3) state permitted sanitary landfills in northern Indiana. There are a large number of unpermitted landfills and dumps in this area that do not meet minimum state health requirements. Four (4) of these unpermitted sites lie within two (2) miles of subject facility. They are the Wheeler Landfill, the Samocki Brothers Dump, the Cliff Rolland Dump, and the City of Gary Municipal Dump. The latter dump site meets the fewest minimum state health requirements. This city dump is 100 acres of raw refuse that is reportedly burned three (3) times each year. This site lies in a sand quarry that is neither lined nor covered. The operator of the Gary Development facility complained that because of state agency impropriety, his competitors enjoy a distinct monetary advantage that is slowly forcing him out of business.

A memo summarizing the results of the water samples collected at this site is forthcoming.

Note: Gary Development, Inc. has requested a copy of the report.

PH:4M

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	D077005916

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
GARY DEVELOPMENT LANDFILL	479 N. CLINE (CLINE & GARY AVES)

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
GARY	IN	46406	LAKE	89	1

09 COORDINATES LATITUDE	LONGITUDE
41°36'15.0"	087°25'30.0"

10 TYPE OF OWNERSHIP (Check one)
[X] A. PRIVATE [ ] B. FEDERAL _____ [ ] C. STATE [ ] D. COUNTY [ ] E. MUNICIPAL
[ ] F. OTHER _____ [ ] G. UNKNOWN

III. INSPECTION INFORMATION

01 DATE OF INSPECTION (MONTH DAY YEAR)	02 SITE STATUS	03 YEARS OF OPERATION
12,27,83	[X] ACTIVE [ ] INACTIVE	SEPT 1974 (BEGINNING YEAR) _____ (ENDING YEAR) ___ UNKNOWN

04 AGENCY PERFORMING INSPECTION (Check all that apply)
[ ] A. EPA [X] B. EPA CONTRACTOR FIT (E+E, Inc.) (Name of firm) [ ] C. MUNICIPAL [ ] D. MUNICIPAL CONTRACTOR _____ (Name of firm)
[ ] E. STATE [ ] F. STATE CONTRACTOR _____ (Name of firm) [ ] G. OTHER _____ (Specify)

05 CHIEF INSPECTOR	06 TITLE	07 ORGANIZATION	08 TELEPHONE NO.
PAUL HESS	TEAM LEADER	E+E, IN.	(312) 663-9415
09 OTHER INSPECTORS	10 TITLE	11 ORGANIZATION	12 TELEPHONE NO.
JOHN ANGELO	TEAM MEMBER	"	( ) "
DAN COZZA	" "	"	( ) "
ANN SAUBE	" "	"	( ) "
			( )
			( )

13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE	15 ADDRESS	16 TELEPHONE NO
LAWRENCE HAGEN	V.P.-GEN. MGR.	479. N. CLINE AVE.	(219) 944-7858
			( )
			( )
			( )
			( )
			( )

17 ACCESS GAINED BY (Check one)	18 TIME OF INSPECTION	19 WEATHER CONDITIONS
[X] PERMISSION [ ] WARRANT	1:10 PM	OVERCAST, LIGHT WIND, 21°F, SNOW COVER

IV. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NO.
TOR STALL	OFFICE OF SUPERFUND, U.S. EPA	(312) 886-6393

04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NO.	08 DATE
PAUL HESS	FIT	E+E, INC.	(312) 663-9415	1,6,84 (MONTH DAY YEAR)

EPA FORM 2070-13 (7-81)

USS000346

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION
01 STATE: IN | 02 SITE NUMBER: D077005916

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)
- [X] A. SOLID
- [X] B. POWDER, FINES
- [X] C. SLUDGE
- [ ] D. OTHER (Specify)
- [ ] E. SLURRY
- [X] F. LIQUID
- [ ] G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)
- TONS:
- CUBIC YARDS: 190,075
- NO OF DRUMS:

03 WASTE CHARACTERISTICS (Check all that apply)
- [X] A. TOXIC
- [X] B. CORROSIVE
- [ ] C. RADIOACTIVE
- [X] D. PERSISTENT
- [ ] E. SOLUBLE
- [X] F. INFECTIOUS
- [ ] G. FLAMMABLE
- [ ] H. IGNITABLE
- [ ] I. HIGHLY VOLATILE
- [ ] J. EXPLOSIVE
- [ ] K. REACTIVE
- [ ] L. INCOMPATIBLE
- [ ] M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	71,000	Cu. Yd.	Paint, Mill, Bio., Filter, Neutralized
OLW	OILY WASTE	22,000	"	Recovery, Tank Bottoms
SOL	SOLVENTS			
PSD	PESTICIDES	120	"	Herbicide (Sulfamic Acid)
OCC	OTHER ORGANIC CHEMICALS	1,655	"	Asbestos Fines + Solids
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	95,300	"	Fly Ash, Metal Shavings

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis reports)

Indiana State Board of Health Files

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IN	D077005916

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL [X] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 1-101 — 04 NARRATIVE DESCRIPTION

GROUNDWATER CONTAMINATION IS ALLEGED BY ISBH MONITORING WELL TESTS. SITE IS SURROUNDED BY OTHER HAZARDOUS WASTE SITES. SURROUNDING GROUND WATER FLOWS TO SITE AND IS PUMPED OUT OF PIT. SITE HAS ARTIFICIALLY LOW WATER TABLE. THERE ARE FEW PRIVATE WELLS IN 3 MILE AREA.

01 [X] B. SURFACE WATER CONTAMINATION — 02 [X] OBSERVED (DATE: 3/9/76) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

ISBH HAS WITNESSED LEACHATE DISCHARGE FROM PIT SUMP TO GRAND CALUMET RIVER ON A NUMBER OF OCCATIONS.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

UNKNOWN

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

UNKNOWN

01 [X] E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) [X] POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0-50 — 04 NARRATIVE DESCRIPTION

LANDFILL HAS WORKMEN ON SITE 24 HOURS PER WEEK FOR MOST OF THE YEAR. HOWEVER, OPERATOR REPORTED BREAK-INS TO SITE BUILDING SEVERAL TIMES EACH YEAR.

01 [X] F. CONTAMINATION OF SOIL — 02 [X] OBSERVED (DATE: 3/9/76) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: < 20 ACRES (Acres) — 04 NARRATIVE DESCRIPTION

ISBH HAS WITNESSED DUMPING OF PAINT AND OIL WASTE AS LIQUID DISCHARGE TO LANDFILL.

01 [X] G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) [X] POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 1-101 — 04 NARRATIVE DESCRIPTION

WHEN LANDFILL IS FINIALLY CLOSED, WATER TABLE WILL RISE TO COVER WASTE AND NORMAL GROUNDWATER FLOW PATTERN WILL BE ESTABLISHED. DESOLVED TOXIC MATERIAL CAN THEN MOVE OFF SITE.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

UNKNOWN

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

UNKNOWN

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: IN | 02 SITE NUMBER: 0077005916

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Unknown

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)
Unknown

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Unknown

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES (Spills/Runoff/Standing liquids, Leaking drums) — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
Unknown

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Unknown

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Unknown

01 [X] P. ILLEGAL/UNAUTHORIZED DUMPING — 02 [X] OBSERVED (DATE: 3/9/76) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
ISBH WITNESSED DISCHARGE OF LEACHATE COLLECTING SYSTEM TO THE GRAND CALUMET RIVER. OPERATOR DID NOT HAVE NPDES PERMIT FOR THIS WASTE WATER DISCHARGE.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS
CONTAMINATED GROUND AND SURFACE WATER FROM A NUMBER OF HAZARDOUS WASTE SITE THAT SURROUND THIS SITE MAY BE DISCHARGING TO THIS SITE.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 0 - 150

IV. COMMENTS
SITE HAS LEACHATE COLLECTIVE SYSTEM UNDER WASTE AND WALLS OF SITE ARE LINED WITH CLAY. HOWEVER, SITE WILL NOT CREATE POTENTIAL FOR OFF-SITE MIGRATION UNTIL SITE IS CLOSED.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)
FIT SITE INSPECTION AND ISBH FILES.

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IN	007005916

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED (Check all that apply)	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
☐ A. NPDES				
☐ B. UIC				
☐ C. AIR				
☐ D. RCRA				
☐ E. RCRA INTERIM STATUS				FILED RCRA PART A
☐ F. SPCC PLAN				
☒ G. STATE (Specify)	OPP #45-2	2/20/75	3/1/84	
☒ H. LOCAL (Specify)	SW #133	6/19/73		
☒ I. OTHER (Specify)				ISBH PERMISSION ON A NUMBER OF INDUSTRIAL WASTE
☐ J. NONE				

III. SITE DESCRIPTION

01 STORAGE/DISPOSAL (Check all that apply)	02 AMOUNT	03 UNIT OF MEASURE
☐ A. SURFACE IMPOUNDMENT		
☐ B. PILES		
☐ C. DRUMS, ABOVE GROUND		
☐ D. TANK, ABOVE GROUND		
☐ E. TANK, BELOW GROUND		
☒ F. LANDFILL	UNKNOWN	
☐ G. LANDFARM		
☐ H. OPEN DUMP		
☐ I. OTHER (Specify)		

04 TREATMENT (Check all that apply)

- ☐ A. INCENERATION
- ☐ B. UNDERGROUND INJECTION
- ☐ C. CHEMICAL/PHYSICAL
- ☐ D. BIOLOGICAL
- ☐ E. WASTE OIL PROCESSING
- ☐ F. SOLVENT RECOVERY
- ☐ G. OTHER RECYCLING/RECOVERY
- ☒ H. OTHER (Specify) NONE

05 OTHER

- ☒ A. BUILDINGS ON SITE

06 AREA OF SITE

62 (Acres)

07 COMMENTS THIS LANDFILL IS SURROUNDED BY FIVE HAZARDOUS WASTE SITES. VALCAN (METAL DIV.) HAS TWO SURFACE IMPOUNDMENTS ON THE WEST SIDE OF SITE. CITY SERVICE DISTALLATION PLANT HAS DISPOSED OF PETROLEUM BOTTOMS AT A SITE NORTHWEST OF LANDFILL. CONSERVATION CHEM. PLANT POND ARE LOCATED NORTHEAST OF SITE. GRAND CALUMET RIVER (HIGHLY CONTAMINATED) IS LOCATED TO THE SOUTH OF SITE.

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)

☐ A. ADEQUATE, SECURE ☐ B. MODERATE ☒ C. INADEQUATE, POOR ☐ D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. THIS FORMER SAND PIT WAS CONVERTED TO A LANDFILL BY FIRST DEWATERING THE PIT. THEN THE SIDE WALLS WERE LINED WITH CLAY. THE SOUTH WALL ADJACENT TO GRAND CALUMET RIVER WAS TO HAVE A 10 FOOT BARRIER WALL CONSTRUCTED. INFILTRATION STILL ACCURES FROM SIDE WALLS.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: ☒ YES ☐ NO SITE IS MONITORED BY 24 HOUR WORKMEN.

02 COMMENTS HOWEVER, TRESPASSERS STILL FINE THEIR WAY ONTO SITE. SITE IS NOT FENCED.

VI. SOURCES OF INFORMATION (Cite specific references e g state files sample analysis, reports)

FIT SITE INSPECTION AND ISBH FILES

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE: IN | 02 SITE NUMBER: D077005916

II. DRINKING WATER SUPPLY

01 TYPE OF DRINKING SUPPLY (Check as applicable)

	SURFACE	WELL
COMMUNITY	A. ☒	B. ☐
NON-COMMUNITY	C. ☐	D. ☒

02 STATUS

ENDANGERED	AFFECTED	MONITORED
A. ☐	B. ☐	C. ☐
D. ☐	E. ☐	F. ☐

03 DISTANCE TO SITE
A. >6 (mi)
B. ON-SITE (mi)

III. GROUNDWATER

01 GROUNDWATER USE IN VICINITY (Check one)

☐ A ONLY SOURCE FOR DRINKING ☐ B DRINKING (Other sources available) COMMERCIAL, INDUSTRIAL, IRRIGATION (No other water sources available) ☒ C COMMERCIAL, INDUSTRIAL, IRRIGATION (Limited other sources available) ☐ D. NOT USED, UNUSEABLE

02 POPULATION SERVED BY GROUND WATER 7-10 K

03 DISTANCE TO NEAREST DRINKING WATER WELL _____ (mi)

04 DEPTH TO GROUNDWATER	05 DIRECTION OF GROUNDWATER FLOW	06 DEPTH TO AQUIFER OF CONCERN	07 POTENTIAL YIELD OF AQUIFER	08 SOLE SOURCE AQUIFER
<5 (ft)	SOUTHWEST	<5 (ft)	UNKNOWN (gpd)	☐ YES ☒ NO

09 DESCRIPTION OF WELLS (Including useage, depth, and location relative to population and buildings) THIS AREA HAS VERY FEW PRIVATE DRINKING WATER WELLS. AREA IS MOSTLY INDUSTRIAL USAGE. THE ON-SITE WELL IS 365FT. DEEP AND IN AN AQUIFER SEPERATED BY 65FT. OF NATURAL CLAY. WELL IS NOT IN AQUIFER OF CONCERN.

10 RECHARGE AREA
☐ YES ☒ NO
COMMENTS

11 DISCHARGE AREA
☒ YES ☐ NO
COMMENTS THE SRROUNDING GROUNDWATER FLOWS TO SITE AND ITS SUMP.

IV. SURFACE WATER

01 SURFACE WATER USE (Check one)

☒ A. RESERVOIR, RECREATION DRINKING WATER SOURCE ☐ B. IRRIGATION, ECONOMICALLY IMPORTANT RESOURCES ☐ C COMMERCIAL, INDUSTRIAL ☐ D. NOT CURRENTLY USED

02 AFFECTED/POTENTIALLY AFFECTED BODIES OF WATER

NAME:	AFFECTED	DISTANCE TO SITE
GRAND CALUMET RIVER (RECREATION)	☒	<50 FT. (mi)
LAKE MICHIGAN (DRINKING WATER)	☐	>6 (mi)
	☐	(mi)

V. DEMOGRAPHIC AND PROPERTY INFORMATION

01 TOTAL POPULATION WITHIN

ONE (1) MILE OF SITE	TWO (2) MILES OF SITE	THREE (3) MILES OF SITE
A. _____ NO OF PERSONS	B. _____ NO OF PERSONS	C. _____ NO OF PERSONS

02 DISTANCE TO NEAREST POPULATION
>1/2 (mi)

03 NUMBER OF BUILDINGS WITHIN TWO (2) MILES OF SITE
_____

04 DISTANCE TO NEAREST OFF-SITE BUILDING
500 FT (mi)

05 POPULATION WITHIN VICINITY OF SITE (Provide narrative description of nature of population within vicinity of site, e.g., rural, village, densely populated urban area)

EPA FORM 2070-13 (7-81)

USS000351

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE: IN | 02 SITE NUMBER: D077005911

VI. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one)

☐ A. $10^{-6} - 10^{-8}$ cm/sec ☐ B. $10^{-4} - 10^{-6}$ cm/sec ☐ C. $10^{-4} - 10^{-3}$ cm/sec ☒ D. GREATER THAN 10^{-3} cm/sec

02 PERMEABILITY OF BEDROCK (Check one)

☒ A. IMPERMEABLE (Less than 10^{-6} cm/sec) ☐ B. RELATIVELY IMPERMEABLE ($10^{-4} - 10^{-6}$ cm/sec) ☐ C. RELATIVELY PERMEABLE ($10^{-2} - 10^{-4}$ cm/sec) ☐ D. VERY PERMEABLE (Greater than 10^{-2} cm/sec)

03 DEPTH TO BEDROCK	04 DEPTH OF CONTAMINATED SOIL ZONE	05 SOIL pH	
65 (ft)	UNKNOWN (ft)	6.0 TO 7.0	

06 NET PRECIPITATION	07 ONE YEAR 24 HOUR RAINFALL	08 SLOPE: SITE SLOPE	DIRECTION OF SITE SLOPE	TERRAIN AVERAGE SLOPE
4 (in)	2 (in)	30 %	ALL SIDES	< 3 %

09 FLOOD POTENTIAL: SITE IS IN 100 YEAR FLOODPLAIN

10 ☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

11 DISTANCE TO WETLANDS (5 acre minimum): ESTUARINE A. NONE (mi); OTHER B. < 1/2 (mi)

12 DISTANCE TO CRITICAL HABITAT (of endangered species): NONE (mi); ENDANGERED SPECIES: NONE

13 LAND USE IN VICINITY

DISTANCE TO: COMMERCIAL/INDUSTRIAL A 500 FEET (mi); RESIDENTIAL AREAS; NATIONAL/STATE PARKS, FORESTS, OR WILDLIFE RESERVES B < 1/2 (mi); AGRICULTURAL LANDS: PRIME AG LAND C. NONE (mi); AG LAND D. > 6 (mi)

14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

THIS SITE WAS A 62 ACRE SAND MINE THAT WAS 30 TO 40 FEET DEEP WHEN IT WAS ABANDONED. THE BOTTOM OF THIS PIT IS 65 FT. OF NATURAL CLAY. THE SURROUNDING TOPGRAPHY IS RELATIVELY FLAT AND HEAVILY FILLED. THE WHOLE SOUTHERN COST OF LAKE MICHIGAN AT ONE TIME WAS FLAT SWAMP LAND, THAT HAS A VERY SANDY TOP SOIL. THE LANDFILL IS DOMED TO THE SOUTH SIDE OF PIT ABOUT 50 FEET ABOVE THE SURROUNDING AREA. THE NORTH END OF PIT IS STILL OPEN. THE GRAND CALUMET RIVER RUNS ALONG THE SOUTH BOUNDARY OF SITE. THE NORTHERN AREA OF INDIANA IS VERY HEAVY INDUSTRY.

VII. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis reports)

FIT SITE INSPECTION AND ISBA FILES

EPA FORM 2070-13 (7-81)

USS000352

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 6 - SAMPLE AND FIELD INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	D077005916

II. SAMPLES TAKEN

SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 SAMPLES SENT TO	03 ESTIMATED DATE RESULTS AVAILABLE
GROUNDWATER	TWO	AQUATECH AND CHEMTECH	6 WEEKS
SURFACE WATER	ONE	" " "	6 WEEKS
WASTE			
AIR			
RUNOFF			
SPILL			
SOIL			
VEGETATION			
OTHER			

III. FIELD MEASUREMENTS TAKEN

01 TYPE	02 COMMENTS
NONE - THE WEATHER CONDITIONS WERE TOO COLD AND THE GROUND SURFACE WAS COVERED WITH SNOW.	

IV. PHOTOGRAPHS AND MAPS

01 TYPE ☒ GROUND ☐ AERIAL

02 IN CUSTODY OF U.S. EPA, OFFICE OF SUPERFUND
(Name of organization or individual)

03 MAPS ☒ YES ☐ NO

04 LOCATION OF MAPS ATTACHED TO COVER MEMO

V. OTHER FIELD DATA COLLECTED (Provide narrative description)

NONE

VI. SOURCES OF INFORMATION (Cite specific references e g , state files, sample analysis, reports)

FIT SITE INSPECTION

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 7 - OWNER INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	D077005916

II. CURRENT OWNER(S)

01 NAME	02 D+B NUMBER
GARY DEVELOPMENT, INC.	

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE
479 N. CLINE AVE.	

05 CITY	06 STATE	07 ZIP CODE
GARY	IN	46406

PARENT COMPANY (If applicable)

08 NAME	09 D+B NUMBER

10 STREET ADDRESS (P O Box, RFD #, etc)	11 SIC CODE

12 CITY	13 STATE	14 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 NAME	09 D+B NUMBER

10 STREET ADDRESS (P O Box, RFD #, etc.)	11 SIC CODE

12 CITY	13 STATE	14 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 NAME	09 D+B NUMBER

10 STREET ADDRESS (P O Box, RFD #, etc)	11 SIC CODE

12 CITY	13 STATE	14 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 NAME	09 D+B NUMBER

10 STREET ADDRESS (P O. Box RFD #, etc)	11 SIC CODE

12 CITY	13 STATE	14 ZIP CODE

III. PREVIOUS OWNER(S) (List most recent first)

01 NAME	02 D+B NUMBER
NONE	

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

IV. REALTY OWNER(S) (If applicable, list most recent first)

01 NAME	02 D+B NUMBER
ROCK ROAD CONSTRUCTION CO.	

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE
5915 N. ROGERS AVE.	

05 CITY	06 STATE	07 ZIP CODE
CHICAGO	IL.	

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P O Box RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P O Box, RFD #, etc)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

V. SOURCES OF INFORMATION (Cite specific references, e g , state files, sample analysis, reports)

ISBH FILES

EPA FORM 2070-13 (7-81)

USS000354

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 8 - OPERATOR INFORMATION

I. IDENTIFICATION
01 STATE: IN | 02 SITE NUMBER: D077005816

II. CURRENT OPERATOR (Provide if different from owner)

01 NAME	02 D+B NUMBER
GARY DEVELOPMENT, INC	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
479 N. CLINE AVE.	

05 CITY	06 STATE	07 ZIP CODE
GARY	IN	46406

08 YEARS OF OPERATION	09 NAME OF OWNER

OPERATOR'S PARENT COMPANY (If applicable)

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

III. PREVIOUS OPERATOR(S) (List most recent first, provide only if different from owner)

01 NAME	02 D+B NUMBER
NONE	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

PREVIOUS OPERATORS' PARENT COMPANIES (If applicable)

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

10 NAME	11 D+B NUMBER

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

IV. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

LAWRENCE HAGEN

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IA	D077005916

II. ON-SITE GENERATOR

01 NAME	02 D+B NUMBER
NONE.	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

III. OFF-SITE GENERATOR(S) SEE ATTACHED LIST

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

IV. TRANSPORTER(S) SEE ATTACHED LIST

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

ISBA FILES

EPA FORM 2070-13 (7-81)

USS000356

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION
01 STATE: IN | 02 SITE NUMBER: D077005916

II PAST RESPONSE ACTIVITIES (Continued)

01 ☐ R. BARRIER WALLS CONSTRUCTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☒ S. CAPPING/COVERING — 02 DATE 1983 — 03 AGENCY ISBH
04 DESCRIPTION
CONSENT DECREE BETWEEN ISBH AND OPERATOR

01 ☐ T. BULK TANKAGE REPAIRED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ U. GROUT CURTAIN CONSTRUCTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ V. BOTTOM SEALED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ W. GAS CONTROL — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ X. FIRE CONTROL — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ Y. LEACHATE TREATMENT — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ Z. AREA EVACUATED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ 1. ACCESS TO SITE RESTRICTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ 2. POPULATION RELOCATED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ 3. OTHER REMEDIAL ACTIVITIES — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

III. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

ISBH FILES

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION
01 STATE: IN | 02 SITE NUMBER: 007005916

II. PAST RESPONSE ACTIVITIES

01 ☐ A. WATER SUPPLY CLOSED | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ B. TEMPORARY WATER SUPPLY PROVIDED | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ C. PERMANENT WATER SUPPLY PROVIDED | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ D. SPILLED MATERIAL REMOVED | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ E. CONTAMINATED SOIL REMOVED | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ F. WASTE REPACKAGED | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ G. WASTE DISPOSED ELSEWHERE | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☒ H. ON SITE BURIAL | 02 DATE SEE FILE | 03 AGENCY ISBH
04 DESCRIPTION: ISBH GRANTED SPECIAL APPROVAL TO SITE OPERATOR TO BURY A NUMBER OF INDUSTRIAL (HAZARDOUS) WASTES.

01 ☐ I. IN SITU CHEMICAL TREATMENT | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ J. IN SITU BIOLOGICAL TREATMENT | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ K. IN SITU PHYSICAL TREATMENT | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ L. ENCAPSULATION | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☐ M. EMERGENCY WASTE TREATMENT | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☒ N. CUTOFF WALLS | 02 DATE 1973 | 03 AGENCY ISBH
04 DESCRIPTION: SEE CONSTRUCTION PERMIT AND FILE

01 ☒ O. EMERGENCY DIKING/SURFACE WATER DIVERSION | 02 DATE 1983 | 03 AGENCY ISBH
04 DESCRIPTION: EXTENTION TO 1973 CONSTRUCTION PERMIT

01 ☐ P. CUTOFF TRENCHES/SUMP | 02 DATE _____ | 03 AGENCY _____
04 DESCRIPTION: NA

01 ☒ Q. SUBSURFACE CUTOFF WALL | 02 DATE 1973 | 03 AGENCY ISBH
04 DESCRIPTION: SEE CONSTRUCTION PERMIT AND FILE

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 11 - ENFORCEMENT INFORMATION

I. IDENTIFICATION

01 STATE: IN | 02 SITE NUMBER: D077005916

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY/ENFORCEMENT ACTION [X] YES [ ] NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

1983 CONSENT DECREE

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

ISBH FILES

EPA FORM 2070-13 (7-81)

USS000359

ATTACHMENT I

GENERATORS

Jones and Laughlin Steel Company, East Chicago
Union Carbide, East Chicago
American Maize Products Company
American Chemical Service
E. I. DuPont
U. S. Reduction
Youngstown Sheet and Tube, East Chicago
U. S. Steel
Calumet Waste Systems
Vulcan Materials Company Company, Gary
Energy Cooperative, Inc., East Chicago
Industrial Rubbish Removal
U. S. S, Lead Refinery, Inc.
C. F. Petroleum
Lever Brothers Company
Conservation Chemical Company
Industrial Disposal
General Drainage
Calumet Wastes, Inc.
Independent Waste
City of Hammond
Amoco Oil Company, Whiting
Standard Steel Speciality Company, Hammond
Cities Services Refinery, Gary
Former Ashland Chemical Plant, Hammond
Borg - Warner, Bellwood, Illinois
Georgia Pacific
Shell Oil Refinery
Brandenberg Demolition

ATTACHMENT I

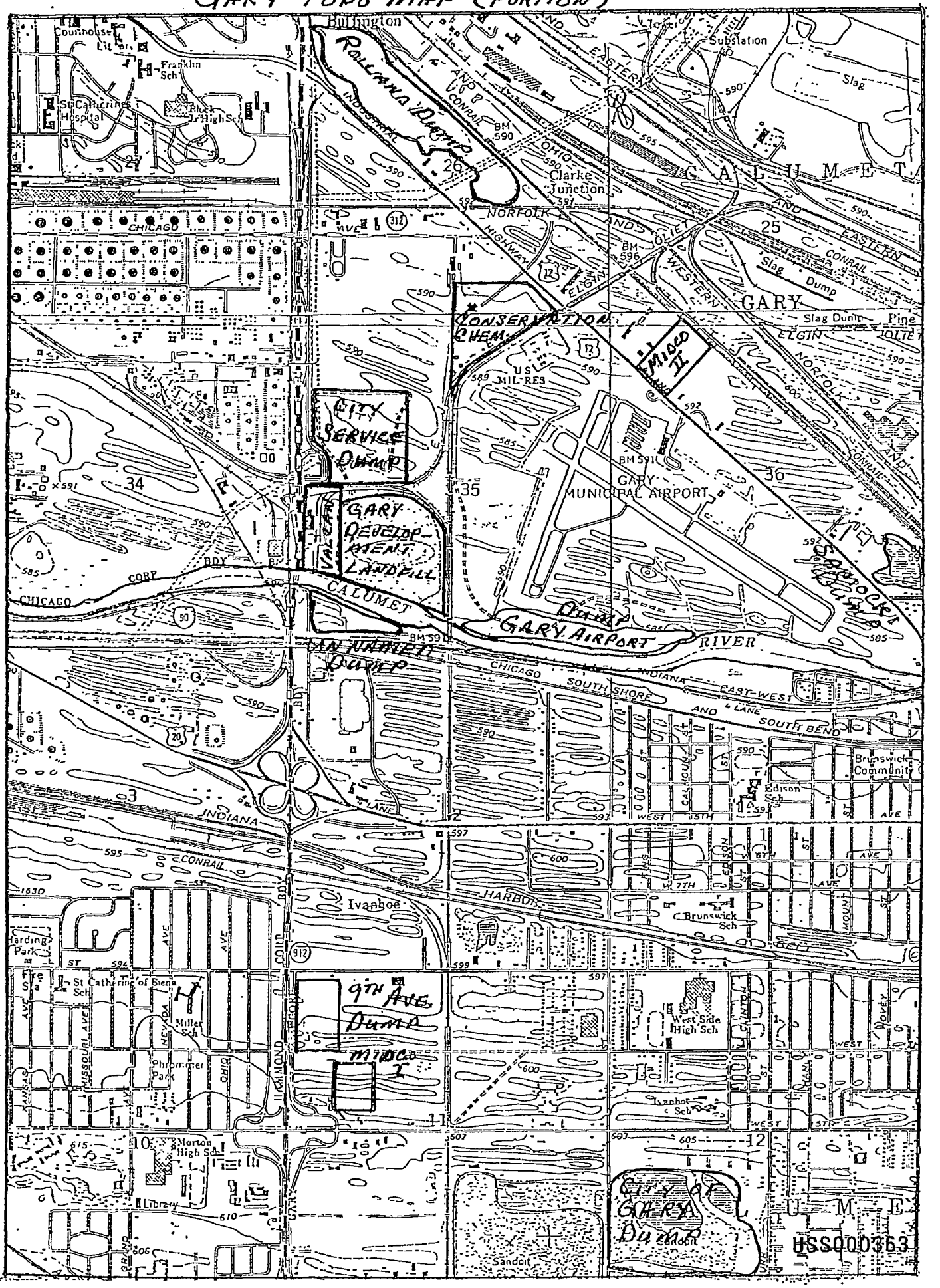
TRANSPORTERS

Indiana Waste Systems, Inc.
City of Hammond
Industrial Disposal Corporation, East Chicago
Calumet Wastes, Inc., Hammond
Indepenndt Wastes
General Drainage
Lender Industries
Liquid Dynamics
Correct Maintenance

EJ&E
GARY AVE.
N
FRONTAGE ROAD
CLINE AVE.
WEST DITCH
SITE
#2
#1
GRAND CALUMET RIVER
ELGIN JOLIET & EASTERN
GARY DEVELOPMENT, INC.
GARY, INDIANA
SITE SKETCH 1-20-84
NOT TO SCALE

USS000362

GARY TOPO MAP (PORTION)



FEB 08 1984

2A

FEB 13 9 03 AM '84

John M.
John M. Kyle III
Barnes and Thornburg
1313 Merchants Bank Building
Indianapolis, Indiana 46204

Re: Gary Development Landfill
Gary, Indiana

Dear Mr. Kyle:

Thank you for your letter of October 7, 1983, requesting the removal of Gary Development Landfill from the Federal hazardous waste management system. Based upon the information you have supplied, plus other information available to this office, the facility is required to have a Resource Conservation and Recovery Act (RCRA) permit, and may not be withdrawn from the hazardous waste system.

Your request is based upon the quantity of hazardous wastes disposed of at the landfill. RCRA regulations do not provide for waivers of closure or post-closure requirements based upon the quantity of wastes handled. Furthermore, we have learned that your statements concerning the wastes that Gary Development has accepted from American Chemical Service, Inc. are inaccurate in several respects. A recent inspection of American Chemical Service revealed that 33 shipments of hazardous waste, labelled F005, were sent by manifest to Gary Development in 1981. Each shipment was approximately 2750 gallons. In addition, we were informed that a number of shipments of the same material were erroneously sent without manifests from November 19, 1980, until early 1981. This contradicts your statement that only four to six loads were received from American Chemical Service.

The hazardous waste number F005 represents certain non-halogenated solvents which are listed as hazardous wastes for the properties of ignitability and toxicity. Our understanding of the process which generates the wastes leads us to believe that any of the hazardous waste types handled by American Chemical Service might be present in the wastes sent to Gary Development. This includes hazardous waste numbers F001, F002, F005, U147, U031, U112, U002, U154, D001 and F003. The first three wastes in this list are hazardous because of their toxicity. American Chemical service also handles paint waste, which may be hazardous due to heavy metal toxicity. Therefore, we find your assertion that American Chemical Service waste is only ignitable to be invalid.

Finally, we discovered that the American Chemical Service wastes were not mixed with sand to eliminate ignitability, as your January 24, 1983, letter to George Garland states. The co-mixing of sand and wastes did not begin until late 1981 or early 1982.

With respect to your question concerning the applicability of 40 CFR Parts 264 and 265 to the activities performed by Gary Development Landfill, please find enclosed a copy of the November 22, 1983, Federal Register. This amendment clarifies the applicability of the hazardous waste regulations to existing facilities which fail to qualify for interim status, such as Gary Development. On page 52719, it is stated that "EPA has both the statutory and regulatory authority to apply either the Part 264 general permitting standards or the Part 265 interim status standards to existing facilities which have failed to qualify for interim status." The document sets forth an amendment to 40 CFR §265.1 which establishes that Part 265 is the appropriate set of standards applicable to facilities such as Gary Development Landfill, until a permit is issued. Since the State of Indiana has received Phase I interim authorization, the Indiana State Board of Health (ISBH) is responsible for administering the interim status standards in lieu of the Federal government. Indiana has clarified the applicability issue by deleting §265.1(b) in their adoption of Part 265, and inserting language which makes the standards applicable to all hazardous waste facilities regardless of permit status.

Factors which ISBH may consider in approving any closure and post-closure plans submitted by the landfill do include the quantity, types of waste, and methods of management. Because of the landfill's repeated ratings of "unacceptable operation" in State inspections, its location in the Grand Calument River floodplain, and the actual quantity and nature of American Chemical Service waste disposed of there, we believe that proper closure will involve a design with numerous protective measures.

We have considered the above factors, plus the Agreed Order reached between the Environmental Management Board and Gary Development in early 1983, and have concluded that it is not in the public interest for Gary Development Landfill to be issued an Interim Status Compliance Letter for continued hazardous waste operation. Since the Landfill does not have interim status or a permit, closure and post-closure are required.

In summary, (1) Gary Development Landfill is in violation of RCRA Section 3005, plus 40 CFR §§270.2(c), 270.10(a) and 124.3(a), for disposal of hazardous wastes without a permit; (2) the landfill is subject to regulation under 320 Indiana Administrative Code, Article 4; and (3) the landfill must undergo closure pursuant to these regulations to avoid enforcement action by this office.

BRYAN CAVE

Susan E. Brice
Direct: (312) 602-5124
Fax: (312) 698-7524
susan.brice@bryancave.com

RECEIVED AUG 2 0 2012

August 20, 2012

Bryan Cave LLP
161 North Clark Street
Suite 4300
Chicago, IL 60601-3315
Tel (312) 602-5000
Fax (312) 602-5050
www.bryancave.com

Ms. Deena Sheppard
USEPA
77 West Jackson, Blvd, SE-5J
Chicago, IL 60604-3590

Re: **Gary Development Landfill Site, Gary, Indiana; Response of Brandenburg Industrial Service Company to EPA's May 17, 2012 Request for Information Pursuant to 42 U.S.C. § 9604(e)**

Dear Ms. Sheppard:

This letter and its enclosure are submitted on behalf of Brandenburg Industrial Service Company ("Brandenburg") in response to the above referenced information request (the "Request").

Sincerely,

Susan E. Brice

AD9:umi

cc: Brandenburg Industrial Service Company

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS REGARDING RESPONSES TO INFORMATION REQUEST QUESTIONS

Brandenburg Industrial Service Company ("Brandenburg") is voluntarily submitting the information and documents contained in its Response, but it reserves all of its legal rights based on the objections noted below. Brandenburg states that certain information sought by EPA no longer exists. Brandenburg follows a document retention policy in its normal course of business. Based on its good faith efforts to interpret and respond to the Request and subject to its objections, the Company submits this Response.

On May 17, 2012, Nicole Wood of EPA sent an email to Brandenburg's counsel clarifying the scope of the 104(e) Request. Ms. Wood stated that "the information request we sent your client consisted of questions not intended for Brandenburg specifically, but often included in EPA's standard 104(e) requests. As such, please let this email serve as your record that at this time EPA is interested only in records in Brandenburg's possession and control that relate to the Gary Development Landfill. Please do not send us the insurance information at this time." Accordingly, Brandenburg responds only to Requests 1, 2 and 4. All Exhibits referenced in Brandenburg's response are submitted in further support hereof.

Brandenburg asserts the following general privileges, protections and objections with respect to the Request and each information request (also referred to as "Questions") therein.

1. Brandenburg asserts all privileges and protections it has in regard to the documents and other information sought by EPA, including the attorney-client privilege, the attorney work product doctrine, all privileges and protections related to materials generated in anticipation of litigation, the settlement communication protection, the confidential business information ("CBI") and trade secret protections, the joint defense privilege and any other privilege or protection available to it under law. In the event that a privileged or protected document has been inadvertently included among the documents produced in response to the Request, Brandenburg asks that any such document be returned to Brandenburg immediately and here states for the record that it is not waiving any available privilege or protection as to any such document.

2. Brandenburg objects to any requirement to produce documents or information already in the possession of a government agency, including but not limited to EPA, or already in the public domain. Subject to and without waiving this objection, Brandenburg may produce certain information or documents in its possession, custody, or control that it previously provided to or obtained from government agencies that contain information responsive to the Request.

3. Brandenburg objects to the extent the Request seeks information and documents not within its possession, custody or control of Brandenburg and/or seeks to require Brandenburg to gather responsive information from former employees/agents/contractors. Brandenburg is aware of no obligation that it has under Section 104(e) of CERCLA to seek out information from individuals who are not currently employed by Brandenburg. Brandenburg disclaims any responsibility to search for, locate, and provide EPA copies of any documents "known [by Brandenburg] to exist" but not in Brandenburg's possession, custody, or control.

4. Brandenburg objects to the extent the Request is beyond the scope of the Agency's authority to request information or require under CERCLA § 104(e) and/or imposes any burden on Brandenburg not imposed by applicable discovery provisions of the Federal Rules of Civil Procedure and the Consolidated Rules of Administrative Practice at 40 CFR Part 22.

5. Brandenburg objects to Instruction No. 5 to the extent it seeks to impose a continuing obligation on Brandenburg to supplement these responses. Further, this Instruction is unlimited as to time. Brandenburg will, of course, comply with any lawful future requests that are within EPA's authority and reserves the right to voluntarily supplement its responses at any time should additional information become available.

6. Brandenburg objects to the definition of "you," "your company," and "Respondent" in Definition 10 as overbroad. Subject to and without waiving this objection, Brandenburg has undertaken a diligent and good faith effort to locate and furnish documents and information in its possession, custody, and control that are responsive to the Request.

7. Brandenburg objects to the Request to the extent it asks Brandenburg to make legal conclusions concerning CERCLA liability.

8. Brandenburg objects to the Request's use of the legal terms that assume legal conclusions, such as "hazardous substance" and "arranged for disposal." Brandenburg makes no legal conclusions in this Response.

OBJECTIONS AND RESPONSES

REQUEST NO. 1: Provide copies of all documents, records, and correspondence in your possession relating to the Gary Development Landfill.

> **RESPONSE NO. 1:** Brandenburg objects to the Request and overbroad, unduly burdensome and not reasonably limited in time or scope. Subject to and without waiving these and its general objections, Brandenburg produces documents it has located relating to the Gary Development Landfill.

REQUEST NO. 2: In regard to materials your company disposed of at Gary Development Landfill, arranged for disposal of at Gary Development Landfill, or transported to Gary Development Landfill, identify and describe, and provide all documents that refer or relate to:

> **RESPONSE NO. 2:** Brandenburg objects to the Request as vague, ambiguous, overbroad, unduly burdensome, calling for legal conclusions and not reasonably limited in time or scope. Subject to and without waiving these and its general objections, Brandenburg provides the following responses:
>
> > **REQUEST NO. 2a**. The precise location, address, and name of the facility where disposal, treatment, unloading, management, and handling of the hazardous substances occurred. Provide the official name of the facility and a description of the facility where each hazardous substance involved in such transactions was actually disposed or treated.

RESPONSE NO. 2a: Brandenburg objects to the Request as not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg has located documents indicating that it transported a small amount of materials to the Gary Development Landfill in late 1980 and in 1985.

No intermediate sites were used for the transportation of materials, management, or handling of hazardous substances delivered to Gary Development Landfill. All materials were shipped directly from each project site to the Gary Development Landfill.

REQUEST NO. 2b. If the location or facility of such disposal, treatment, unloading, management and handling is a different location or facility than what was originally intended, please provide all documents that relate and/or refer to why the substances came to be located at the different location or facility.

RESPONSE NO. 2b: Brandenburg objects to the Request as vague, ambiguous, not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that it does not believe the materials were intended to be sent to a different location when they left the Ashland and DuPont facilities.

No intermediate sites were used for the transportation of materials delivered to Gary Development Landfill. All materials were shipped directly from each project site to the Gary Development Landfill.

REQUEST NO. 2c. All intermediate sites where the hazardous substances involved in each arrangement were transshipped, or where they were stored or held, any time prior to final treatment or disposal.

RESPONSE NO. 2c: Brandenburg objects to the Request as vague, ambiguous, not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states the materials shipped in late 1980 originated at the Ashland Chemical Plant in Hammond, Indiana ("Ashland Materials"). The materials shipped in 1985 originated at the E.I. Du Pont Nemours and Company facility in East Chicago, Indiana ("DuPont Materials").

No intermediate sites were used for the transshipment, storage or holding of materials delivered to Gary Development Landfill. All materials were shipped directly from each project site to the Gary Development Landfill.

REQUEST NO. 2d. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each arrangement.

RESPONSE NO. 2d: Brandenburg objects to the Request as vague, ambiguous, not reasonably limited in time or scope and as calling for a legal

conclusion. Subject to and without waiving these and its general objections, Brandenburg states that the Ashland Materials were comprised of pipe insulating asbestos material which had been thoroughly wet down and put into plastic bags bearing the proper warning labels. The State of Indiana gave Brandenburg approval to dispose of 300 cubic yards of pipe insulating asbestos material at the Gary Development Landfill.

Brandenburg does not have records of the actual amount shipped. Because of the amount paid to Gary Development Landfill, Brandenburg concludes that the total quantity shipped under that permit was significantly less that the permitted 300 cubic yard quantity.

The State approval states that the material is "to be mixed (by Gary Development Landfill) with refuse and covered with a minimum of six inches of cover soil immediately. It also provides that the asbestos must be sufficiently dampened (by Brandenburg) to prevent airborne contamination during compaction. It requires that the landfill comply with 330 IAC 4-1 (Regulations SPC 18) and obtain any necessary local approvals from the Lake County Health Department.

We do not have records of the actual amount shipped from the DuPont project to Gary Development Landfill. The DuPont Materials were comprised of asbestos-containing pipe and equipment insulation that was handled and transported in accordance with the law.

The small number and amount of payments to Gary Development Landfill associated with this job suggest the DuPont Material sent to the Site was minimal. Records suggest there were only two loads, one around September 30, 1985 and one around October 11, 1985. The total amount paid to Gary Development Landfill relating to the DuPont demolition was less than $2,000. See documents produced.

It was our intent to ship each load destined for Gary Development Landfill to that location. No loads were diverted or turned around.

REQUEST NO. 2e. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement.

RESPONSE NO. 2e: Brandenburg incorporates its response to Request No. 2d as its response.

REQUEST NO. 2f. The condition of the transferred material containing hazardous substances when it was stored, disposed, treated or transported for disposal or treatment.

RESPONSE NO. 2f: Brandenburg incorporates its response to Request No. 2d as its response.

REQUEST NO. 2g. The markings on and type, condition and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment.

RESPONSE NO. 2g: Brandenburg incorporates its response to Request No. 2d as its response.

REQUEST NO. 2h. All tests, analyses, analytical results and manifests concerning each hazardous substance involved in each transaction. Please include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.)

RESPONSE NO. 2h: Brandenburg objects to the Request as not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that it has been unable to locate any manifests relating to the Ashland Materials. However, Brandenburg is aware that the asbestos involved in the Ashland Chemical Plant demolition included amosite and chrysotile asbestos. See attached documents. Not all of the asbestos materials involved in the Ashland Chemical Plant demolition were sent to the Gary Development Landfill. No testing documents have been located regarding the DuPont Materials.

REQUEST NO. 2i. The final disposition of each of the hazardous substances involved in each arrangement.

RESPONSE NO. 2i: Brandenburg incorporates its response to Request No. 2d as its response.

REQUEST NO. 2j. All persons, including you, who may have entered into an agreement or contract for the disposal, treatment or transportation of a hazardous substance at or to the Site. Please provide the persons' titles and departments/offices.

RESPONSE NO. 2j: Brandenburg objects to the Request as not limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that Brandenburg Demolition, Inc. was involved in the transportation of the Ashland Materials and DuPont Materials. Documents indicate that Jack Hesotian and William Somerville, former employees of Brandenburg and Lawrence Hagen of Gary Development participated in the Ashland Materials arrangement.

REQUEST NO. 2(j)(i). The names, addresses, and telephone numbers of persons or entities who received the hazardous substances from the persons described in 2(j) above.

RESPONSE NO. 2(j)(i): Brandenburg objects to the Request as not limited in time or scope and as calling for a

legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that it does not know at this time.

REQUEST NO. 2(j)(ii). Any person with whom the persons described in 2(j) made such arrangements.

RESPONSE NO. 2(j)(ii): Brandenburg incorporates its response to Request No. 2j as its response.

REQUEST NO. 2(j)(iii). The dates when each person described in 2(j) made such arrangements and provide any documentation.

RESPONSE NO. 2(j)(iii): Brandenburg objects to the Request as not limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that the transportation arrangements for the Ashland Materials occurred in November and December 1980. The DuPont Materials were shipped on or around September 30, 1985 and October 11, 1985. See attached documents.

REQUEST NO. 2(j)(iv). The steps you or other persons, including persons identified in 2(j) above took to reduce the spillage or leakage. Please identify any operational manuals or policies (e.g. a facility's spill control policy) which address the management of spills and leaks and provide any documentation.

RESPONSE NO. 2(j)(iv): Brandenburg objects to the Request as overbroad and not reasonably limited in time or scope. Subject to and without waiving these and its general objections, Brandenburg incorporates its response to Request No. 2d. Brandenburg further states that the asbestos material was placed in 6 mil poly bags at the site of removal. The bags were sealed and then washed to remove any exterior asbestos contamination. The washed bags were placed in a dedicated roll-off box for transportation directly to Gary Development Landfill. See attached documents.

REQUEST NO. 2(j)(v). The amount paid by you, or other persons referred to in 2(j) above in connection with each transaction for such arrangement, the method of payment, and the identity of the persons involved. Please provide any contacts, written agreements, or documentation reflecting the terms of the agreements.

RESPONSE NO. 2(j)(v): Brandenburg objects to the Request as not limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that the documents

indicate that Brandenburg paid Gary Development Landfill $579.40 in January 1981; $552.20 in February 1981; $1,258.00 in September 1985; and $684.00 in October 1985. See attached documents.

REQUEST NO. 2(j)(vi). The amount of money received by you or other persons referred to in 2(j) above for the sale, transfer, or delivery of any material containing hazardous substances and provide any documentation. If the material was repaired, refurbished, or reconditioned, how much money was paid for this service?

RESPONSE NO. 2(j)(vi): Brandenburg objects to the Request as vague, ambiguous, not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that it performed demolition services at the Ashland site for and in consideration of receiving title to the scrap metal derived from said demolition. Further, Brandenburg states that it was paid a fee for its overall demolition services associated with the DuPont site.

REQUEST NO. 2k. Who controlled and/or transported the hazardous substances prior to delivery to the Site? Provide agreements and/or documents showing the times when each party possessed the hazardous substances.

RESPONSE NO. 2k: Brandenburg objects to the Request as not limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that the Ashland Materials were originally owned by Ashland Oil, Inc. and were incorporated into buildings on the Ashland Chemical Site. Prior to demolition, the Site was purchased by Rabin Brothers. The DuPont Materials were originally owned by the E.I. DuPont Nemours and Company and were incorporated into buildings at DuPont's East Chicago, Indiana Site.

REQUEST NO. 2l. Identify all persons, including you, who may have transported materials to the Site. Such persons will hereinafter be referred to as "Transporters."

RESPONSE NO. 2l: Brandenburg objects to the Request as not limited in time or scope. Subject to and without waiving this and its general objections, Brandenburg states that it transported the Ashland Materials and the DuPont Materials to the Gary Development Landfill. The identity of the truck driver(s) is unknown at this time.

REQUEST NO. 2(l)(i). State the names, telephone numbers and present or last known addresses of all individuals who you have reason to believe may have knowledge, information or documents

regarding any transportation of materials to the Site, the disposal of materials at the Site, or the identities of the companies whose material was disposed of at the Site. For each individual identified, summarize the types of knowledge, information or documents you believe he or she may have.

RESPONSE NO. 2(l)(i): Brandenburg incorporates its response to Request Nos. 2(d), 2(j) and 2(l).

REQUEST NO. 2(l)(ii). State whether there exists any agreement or contract (other than an insurance policy) which may indemnify the Company, present owners of shares in the Company or past owners of shares in the Company, for any liability that may result under CERCLA for any release of a hazardous substance from the Site. If so, please provide a copy of the agreement or contract. Identify by name and job title the person who prepared the agreement or contract, and if the document is not readily available, state where it is stored, maintained and why it is no longer available.

RESPONSE NO. 2(l)(ii): Brandenburg objects to the Request as calling for a legal conclusion. Subject to and without waiving this and its general objections, Brandenburg states that it is unaware of any such agreement. Investigation continues.

REQUEST NO. 2(l)(iii). State whether an insurance policy has ever been in effect which may indemnify the Company against any liability which the Company may have under CERCLA for any release or threatened release of a hazardous substance that may have occurred at the Site. If so, please provide a copy of the policy. Identify any policy that you cannot locate or obtain by the name of the carrier, years in effect, nature and extent of coverage, and any other information you have.

RESPONSE NO. 2(l)(iii): Brandenburg objects to the Request as calling for a legal conclusion. Subject to and without waiving this and its general objections, Brandenburg states that it is unaware of any such policy. Investigation continues.

REQUEST NO. 2(l)(iv). Identify all persons and entities from whom Transporter accepted materials which were taken directly or indirectly to the Site.

RESPONSE NO. 2(l)(iv): Brandenburg incorporates its response to Request No. 2(d).

REQUEST NO. 2(l)(v). Identify the owners of the materials that were accepted for transportation by the Transporter.

RESPONSE NO. 2(l)(v): Brandenburg incorporates its response to Request Nos. 2(k). With respect to both projects, Brandenburg became the owner of the Ashland and DuPont Materials.

REQUEST NO. 2(l)(vi). Identify the person who selected the Site as the location to which Transporter took the materials to the Site.

RESPONSE NO. 2(l)(vi): Brandenburg objects to the Request as not limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that it does not know who selected the Site.

REQUEST NO. 2(l)(vii). Describe the measures taken by the persons who gave the materials to the Transporters to determine what the Transporters would actually do with the materials they accepted.

RESPONSE NO. 2(l)(vii): Brandenburg objects to the Request as not limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that, at this time, it is unaware of the nature of any actions taken by others with respect to the materials. Further, Brandenburg states that it was the Transporter of the Ashland Materials and DuPont Materials delivered to Gary Development Landfill. Brandenburg incorporates its response to Request Nos. 2(d) and 2(h). Investigation continues.

REQUEST NO. 2(l)(viii). For each material, describe any warnings given to you with respect to its handling.

RESPONSE NO. 2(l)(viii): Brandenburg incorporates its response to Request Nos. 2(d) and 2(h).

REQUEST NO. 2(l)(ix). Identify all locations to which the material was shipped, stored or held prior to their final treatment or disposal.

RESPONSE NO. 2(l)(ix): Brandenburg objects to the Request as calling for a legal conclusion. Subject to and without waiving this and its general objections, Brandenburg states that based upon typical practice, the Ashland Materials and DuPont Materials were sent directly from their point of origin to the Gary Development Landfill.

REQUEST NO. 2(l)(x). The amount paid to each Transporter for accepting the materials for transportation, the method of payment and the identity of the person who paid each transporter.

RESPONSE NO. 2(l)(x): Brandenburg incorporates its response to Request Nos. 2(j)(vi) and 2(k).

REQUEST NO. 2m. The owner(s) or possessor(s) (persons in possession) of the hazardous substances involved in each arrangement for disposal or treatment of the substances. If the ownership(s) changed, when did this change(s) occur? Please provide documents describing this transfer of ownership, including the date of transfer, persons involved in the transfer, reason for the transfer of ownership, and details of the arrangement(s) such as contracts, agreements. etc. If you did not own the hazardous substances when shipped, who did own it and how did you come to own the hazardous substances?

RESPONSE NO. 2m: Brandenburg incorporates its response to Request Nos. 2(d), 2(k) and 2(l)(v) refers to documents produced. By virtue of the dismantling contracts, Brandenburg was the owner of materials shipped to Gary Development Landfill.

REQUEST NO. 2n. Who selected the location where the hazardous substances were to be disposed or treated?

RESPONSE NO. 2n: Brandenburg incorporates its response to Request Nos. 2(l)(vi).

REQUEST NO. 2o. How were the hazardous substances or materials containing hazardous substances planned to be used at the Site?

RESPONSE NO. 2o: Brandenburg incorporates its response to Request No. 2(d).

REQUEST NO. 2p. What was done to the hazardous substances once they were brought to the Site, including any service, repair, recycling, treatment, or disposal.

RESPONSE NO. 2p: Brandenburg incorporates its response to Request No. 2(d) and further states that it does not have first hand knowledge of how Gary Development Landfill handled the Ashland Materials or the DuPont Materials other than what is stated in this Response.

REQUEST NO. 2q. What activities were typically conducted at the Site or the specific facility where the hazardous substances were sent? What were the common business practices at the Site? How and when did you obtain this information?

RESPONSE NO. 2q: Brandenburg objects to the Request as calling for a legal conclusion. Subject to and without waiving this and its general objections, Brandenburg states it became aware of the Gary Development Landfill in late 1980 when it was seeking a location for the Ashland

Materials. Brandenburg understood at the time that the Site operated as a landfill. A review of Brandenburg's records indicate that Brandenburg only sent materials to the Gary Development Landfill on 4 occasions as discussed in Response Nos. 2(a) and 2(j).

Brandenburg has no first-hand knowledge of activities conducted at the Site.

REQUEST NO. 2r. How were the hazardous substances typically used, handled, or disposed of at the Site?

RESPONSE NO. 2r: Brandenburg incorporates its response to Request No. 2(q).

REQUEST NO. 2s. How long did you have a relationship with the owner(s) and/or operator(s) of the Site?

RESPONSE NO. 2s: Brandenburg objects to the Request as calling for a legal conclusion. Subject to and without waiving this and its general objections, Brandenburg states that it did not have an ongoing relationship with the owner or operator of the Gary Development Landfill. Brandenburg became aware of the Gary Development Landfill in 1980. After that time, Brandenburg's records indicate that it only sent materials to the Gary Development Landfill for one other job in 1985.

REQUEST NO. 2t. Did you have any influence over waste disposal activities at the Site? If so, how?

RESPONSE NO. 2t: Brandenburg objects to the Request as calling for a legal conclusion. Subject to and without waiving this and its general objections, Brandenburg states that the State of Indiana sent Lawrence Hagen a letter on December 17, 1980 stating how the Ashland Materials should be handled. Brandenburg did not have influence over how Gary Development Landfill operated its facilities.

REQUEST NO. 2u. What percentage of your total hazardous substances went to the Site?

RESPONSE NO. 2u: Brandenburg objects to the Request as irrelevant, overbroad, not reasonably limited in time or scope and as calling for a legal conclusion.

REQUEST NO. 2v. What steps did you take to dispose of or treat the hazardous substances? Please provide documents, agreements and/or contracts reflecting these steps.

RESPONSE NO. 2v: Brandenburg incorporates its response to Request Nos. 2(d) and 2(m).

REQUEST NO. 2w. What involvement (if any) did you have in selecting the particular means and method of disposal of the hazardous substances.

RESPONSE NO. 2w: Brandenburg incorporates its response to Request Nos. 2(d) and 2(m).

REQUEST NO. 2x. At the time you transferred the hazardous substances, what did you intend to happen to the hazardous substances? Please provide any contracts, written agreements, and/or other documentation reflecting the intention of the parties. If you do not have such documents and/or materials, please so state.

RESPONSE NO. 2x: Brandenburg objects to the Request as not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg states that the Ashland Materials and DuPont Materials were transferred to the landfill in order to be put in the landfill by Gary Development Landfill.

REQUEST NO. 2y. With respect to all transactions involving hazardous substances, at the time of the transaction, specify the measures you took to determine the actual means of treatment, disposal or other uses of hazardous substances. Provide information you had about the treatment and disposal practices at the Site. What assurances, if any, were you given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials you sent there?

RESPONSE NO. 2y: Brandenburg objects to the Request as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg incorporates its response to Request No. 2(d) and further states that it sought approval from the State of Indiana to send the Ashland Materials to Gary Development Landfill and that the State sent Lawrence Hagen a letter outlining how the materials should be handled. Investigation continues.

REQUEST NO. 2z. What efforts, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.

RESPONSE NO. 2z: Brandenburg objects to the Request as not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg incorporates its response to Request No. 2(y) and further states that it relied upon the expertise of the State of Indiana to ensure that the Gary Development Landfill complied with the law.

REQUEST NO. 4. State the date(s) on which the drums and/or hazardous substances were sent, brought or moved to the Site and the names, addresses and telephone numbers of the person(s) making arrangements for the drums to be sent, brought or moved to the Site.

RESPONSE NO. 4: Brandenburg objects to the Request as not reasonably limited in time or scope and as calling for a legal conclusion. Subject to and without waiving these and its general objections, Brandenburg believes the Ashland Materials were moved to the Site on December 23, 1980, December 24, 1980 and possibly December 29, 1980. Brandenburg believes the DuPont Materials were moved to the Site shortly before September 27, 1985 and October 11, 1985. Brandenburg did not send drums to the Site.

REDACTED

ed 143

January disbursements

Date 1981		Chk No	Balance	Deposit	Amount	Fees	Fuel	SDT	Union	Payroll
4C[illegible]	Yarus Oil Co	54[illegible]			579.00					

REDACTED

00144

February Disbursements

Date 1981			Balance	Deposit	Amount	Fica	FWT	SWT	Union	Payroll
2 5	Gary Development Co	557			652.50					

REDACTED

1985				Balance	Deposits	Amount	Discount Earned	Accounts Payable	FICA	
YCS	26	Aarq Dev. Co.	57/103			1258 00		1258 00		29

	1	2	3	4	5	6
1985		Balance	Deposit	Amount	Discount Earned	Accounts Payable	FICA

REDACTED

21	4/24	Maryland Landfill	5715			68400	68400	21

BRANDENBURG DEMOLITION
COMPANY NUMBER 1

**** MONTHLY TRIAL BALANCE ****
ACCOUNTING MONTH 09

DATE 10/18/85 TIME 16.44 PAGE 45 ACG26
OPER CC

G/L ACCOUNT	GENERAL LEDGER ACCOUNT DESCRIPTION	TRANSACTION SOURCE	TRANSACTION DESCRIPTION	DEBIT AMOUNT	CREDIT AMOUNT	JOURNAL REFERENCE NUMBER	JOURNAL ENTRY DATE	CHECK NO.	JOB NUMBER

REDACTED

Y55	GRAV DEV.	DUMP FEES		1,250.00		PJ05-0002	9/30/85		5685

G/L ACCOUNT	GENERAL LEDGER ACCOUNT DESCRIPTION	TRANSACTION SOURCE	TRANSACTION DESCRIPTION	DEBIT AMOUNT	CREDIT AMOUNT	JOURNAL REFERENCE NUMBER	JOURNAL ENTRY DATE	CHECK NO.	JOB NUMBER
454		GARY DEVEL	DUMP FEES 10/7	684.00		PJ24-0001	10/11/85		5685

SEE BACK SIDE

STATE OF INDIANA

INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

DEC 17 1980

DEC 22 1980

Mr. Lawrence Hagen
479 North Cline Avenue
P.O. Box 6056
Gary, IN 46406

Dear Mr. Hagen:

Re: Disposal of Pipe Insulating Asbestos Waste Material from former Ashland Chemical Plant Hammond, Indiana

This letter acknowledges the request for disposal dated November 7, 1980, from Brandenburg Demolition, Inc.

Approval is hereby granted for disposal of 300 cubic yards on a one-time-only basis, of Pipe Insulating Asbestos Waste Material from the former Ashland Chemical Plant at the Gary Land Development, OPP No. 45-2, Lake County. The waste is to be mixed with refuse and covered with a minimum of six inches of cover soil immediately.

The approval is granted subject to the following conditions:

1. The generator and/or hauler must contact you to notify you of the time of disposal and conditions of shipment.

2. Appropriate protective clothing should be used during handling and disposal to insure proper protection from exposure to the material, especially protection from inhalation.

3. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction.

This approval will be revoked if the landfill fails to maintain compliance with 330 IAC 4-1, et seq. (Regulation SPC 18). Any necessary local approval must be obtained from the Lake County Health Department.

If you have any questions, please contact Mr. Steven Wakefield of the Solid Waste Management Section at AC 317/633-0178.

Very truly yours,

Oral H. Hert

Oral H. Hert, Director
Bureau of Engineering

SWakefield/lb
cc: Lake County Health Department
Mr. Jack Hesotian, Brandenburg Demolition, Inc.
Hammond Air Pollution Control

12- 23- 80 1 LOAD 3PM

12- 24- 80 1 LOAD 11:30 AM

12- 29- 80

Fire Asbestos Claim

COLBURN LABORATORIES, INC.

Consulting Chemists

4840 SOUTH WOLCOTT AVENUE • CHICAGO, ILLINOIS 60609 • TELEPHONE 376-7575 (A.C. 312)

LABORATORY REPORT

NO. 21174

September 25, 1980

Brandenburg Demolition, Inc.
2110 South Marshall Boulevard
Chicago, Illinois 60623

Attention: Mr. Jack Hesotian

(Confirming telephone report)

Samples: Eight samples of insulation

Test:

The samples were heated to a temperature of 1650°F, and afterward examined microscopically for the presence of fibers which had not melted.

All 8 samples were found to contain fibers having the appearance of asbestos, after the heat treatment. It is possible that the samples contain rock wool, but usually rock wool is distinguishable from asbestos by microscopic examination. We therefore believe it is highly probable there is asbestos present, but we cannot be positive.

We suggest that if you wish to confirm definitely the presence of asbestos you send the samples to laboratory equipped for electron microscopy.

Respectfully submitted,

COLBURN LABORATORIES, INC.

Wm. Colburn

Pres.

WC:ma
CC(2)

File Ashland

walter c. mccrone associates, inc.
CONSULTING: ULTRAMICROANALYSIS • MICROSCOPY • SMALL PARTICLE PROBLEMS • SOLID-STATE CHEMISTRY

15 October 1980

Mr. Jack Hasotian
Brandenburg of Indiana
P. O. Box 289
Whiting, Indiana 46394

Dear Mr. Hasotian:

We have completed our examination for asbestos in the six (6) samples of building material which you submitted. Examination by polarized light microscopy with dispersion staining revealed that all of the samples contain asbestos. In addition to asbestos the samples contain limestone. The type and quantity of asbestos in each sample is summarized in the table below.

Sample	Type asbestos	% wt. asbestos
Building #1	amosite	20-25
Building #2	amosite	20-25
	chrysotile	5-10
Building #3	amosite	10-15
	chrysotile	15-20
Building #4	amosite	10-15
	chrysotile	10-15
Building #5	amosite	25-30
Building #6	amosite	10-15
	chrysotile	5-10

Thank you for consulting McCrone Associates. If there are any questions, please feel free to call me.

Sincerely,

Mark E. Palenik
Senior Research Microscopist

MEP:gb
Ref: 9437

Brandenburg

Demolition, Inc.

November 7, 1980

Solid Waste Section
1313 West Michigan Av.
Indianapolis, Ind. 46206

Attn: Guinn Doyle

Gentlemen:

We are currently engaged in the dismantlement of the former Ashland Chemical Plant located near 167th and Indianapolis Blvd., Hammond, Indiana and we have generated approximately 300 cubic yards of pipe insulating asbestos material which has been thoroughly wet down and put into plastic bags bearing the proper warning labels.

We would like to secure a permit to transport and dispose of this material at the Gary Land Development Landfill at Gary and Cline Avenues.

Thank you for your cooperation.

Sincerely,

BRANDENBURG DEMOLITION, INC.

Jack M. Hesotian
Asst. Secretary

/ms

2110 South Marshall Boulevard, Chicago, Illinois 60623 - (312) 521-3800

317-633-0178

CALLS to Guinn Doyle

Nov 7th Talked to him

Nov 12th left Mess

Nov 14th left Mess

Nov 18th held for 5 minutes then left Message

9:20 AM Nov 19th left Message

Dec 3rd Wakefield said 2 more weeks going into computer today

Doyle Nov 19th said on 11-28-80 permit should be almost ready

MEMORANDUM

FROM: Thomas J. Little, President

TO: All Brandenburg Employees

SUBJECT: Procedure for Removal of Asbestos Insulation

In the event that the removal of insulation and/or fireproofing materials is anticipated on a given demolition project, a sample of the material will be taken during bid preparation. The sample will then be sent to an outside laboratory for analysis. Assuming the sampled material is found to contain asbestos in a form which may become friable during removal, the following procedure will be strictly adhered to:

(1) After the required warning signs have been posted, and other appropriate security measures taken, each employee who will be working in the general area where the stripping/removal of asbestos will take place, is to be provided with clothing and respiratory protective equipment in accordance with pertinent OSHA regulations. The use of these items is mandatory.

(2) As previously emphasized, the stripping and removal of friable asbestos must be completed prior to the commencement of structural demolition. In all instances the asbestos-containing material must be thoroughly and continuously wet down before, during, and after stripping. It should be noted that sufficient wetting means there are to be "no visible emissions of particulate matter" (i.e., dust), resulting from the stripping operation.

(3) The asbestos material,while still thoroughly wet, will be placed in the standard, properly-labeled poly bags. The bags will then be sealed in such manner as to insure against leakage during transport to the permit-designated landfill.

(4) Supervisory personnel will closely coordinate the removal of the bagged material so as to prevent the accumulation of significant amounts of asbestos on the jobsite.

(5) Specific jobsite conditions will determine when vacuum pump "monitoring" of the air will be required to insure against improper emissions or exposure.

Brandenburg
Demolition, Inc.

SEP 25 1980

September 12, 1980

Machinery & Equipment Co.
Box 3132
San Francisco, California 94119

Attn: Ken Rowell

Gentlemen:

Brandenburg Demolition, Inc. proposes to demolish portions of the former Ashland Chemical Plant located approximately 600 feet west of Indianapolis Boulevard between 165th Street and 167th Street, Hammond, Indiana. We will demolish all portions of this plant which lie north of the office building and east of the large warehouse building according to the following specifications:

(1) We will remove all buildings and structures down to grade elevation.

(2) We will haul and legally dispose of all combustible debris, metallic debris and insulation.

(3) We will leave all concrete and masonry debris on the site.

(4) This proposal does not include the wrecking or removal of concrete or asphalt slabs at or near surrounding grade elevation.

(5) This proposal does not include the removal of foundations below grade elevation.

(6) Upon completion the entire site will be rough graded and left in a neat, clean, safe condition.

(7) We will secure and pay for all necessary licenses and permits.

(8) All utility lines shall be disconnected from the demolition area by others.

(9) We will remove the south most boiler from the boiler house and prepare for shipment including:

(A) Disassembly necessary to ship.

(B) Placement of boiler and parts on railroad car.

(C) Tie boiler to railroad car according to railroad specifications.

(10) The distillation columns ~~and related equipment located west of the fat splitting glycerine area shall be left in place for removal by others.~~ take button around, K. Rowell For Seller, 10A Remove for seller 1- Murray Boiler, in boiler room. K. Rowell,

(11) All salvage and building contents resulting from the above captioned work shall become the property of Brandenburg Demolition, Inc. with the exception of the equipment listed in Paragraph 12. In the event that Machinery & Equipment Co. desires to purchase

Machinery & Equipment Co.

Re: Demolition of the former Ashland Chemical Plant
Hammond, Indiana

any piece of equipment back from Brandenburg Demolition, Inc., Machinery & Equipment Co. shall notify Brandenburg before Brandenburg starts to work on said piece of equipment. Brandenburg shall sell said piece of equipment for a price equal to the scrap value of the equipment. In addition, Machinery & Equipment Co. shall pay Brandenburg Demolition, Inc. all rigging costs incurred in removing said equipment.

(12) The following equipment shall remain the property of Machinery & Equipment Co. This equipment shall be rigged out by Brandenburg Demolition, Inc. and stored on the job site:

(A) Preparation Building and Shipping Building

(1) One Sperry plate and frame filter press together with Shriver power pack.

(2) One stainless steel, jacketed J. H. Day ribbon blender.

(3) One National Rubber Machinery extruder.

(4) One Aerco heat exchanger.

(5) Two Worthington ammonia compressors with 40 H.P. Westinghouse motors, Model VR-7E, S/N L52021 and L52022.

(6) One Cumberland hammermill, Size "O", S/N 8726.

(7) One Reeves vari-speed drive.

(8) One Filtration Engineer's rotary vacuum filter with vacuum pump and receivers.

(9) One horizontal shell and tube heat exchanger with stainless steel shell.

(10) Ten Lightnin agitators.

(11) Six stainless steel clad tanks, approximately fifteen (15) feet in diameter with conical tops and bottoms.

(12) One 312 sq. ft. heat exchanger with stainless steel shell.

(13) One Blaw Knox stainless steel tank rated at 15 P.S.I. @ 400° F.

(B) Open area adjacent to the Destearinizing and Decolorizing Building

(B-1) Seller to retain 1-Tex-O-Matic Boiler in skid mounted shed, outside of Boiler Bldg. R

Brandenburg
Demolition, Inc.

Machinery & Equipment Co.

Re: Demolition of the former Ashland Chemical Plant
Hammond, Indiana

(1) Seven partially disassembled heat exchangers including shells, tube bundles and heads.

(C) East of Fat Splitting Glycerine Building

(1) Two high pressure gas storage tanks approximately 6' diameter by 30'long.

(2) One high pressure splitting column.

(D) Fat Splitting & Glycerine Building

(1) One stainless steel heat exchanger.

(2) Two Blaw Knox stainless steel tanks 10' diameter dish bottoms, flat tops.

(3) One stainless steel tank, flat top and bottom, 5' diameter by 5' high.

(4) One Swenson double effect evaporator system, including two evaporators, one ejector and one barometric condenser.

(5) One small Illinois Water Treatment Co. deionizer.

(6) Two Lightnin agitators.

(7) Two plate and frame filter presses.

(E) Hydrogenation Building

(1) One plate and frame filter press.

(2) Two 12,500 gallon stainless steel tanks, 10' diameter by 20' high.

(13) We will maintain insurance as outlined in the attached certificate.

(14) The above outlined work will be completed prior to March 31, 1981.

We will perform this work for and in consideration of receiving payment in the amount of ONE ($1.00) DOLLAR.

The undersigned warrant that they are the owners or duly authorized agents thereof and that pursuant thereto they have the authority to contract as herein provided.

PROPOSED:

BRANDENBURG DEMOLITION, INC.

Thomas J. Little
President

ACCEPTED:

BY Leonard C. Powell

TITLE President

ACCEPTANCE DATE 9/13/80

File #250
2

MAY 03 REC'D

Ashland Chemical Company
DIVISION OF ASHLAND OIL, INC.
5200 PAUL G. BLAZER MEMORIAL PARKWAY, DUBLIN, OHIO 43017 • (614) 889-3333

CHARLES SAUNDERS, JR.
Associate Division Counsel - Corporate
(614) 889-3859

REPLY TO:
P.O. Box 2219
Columbus, Ohio 43216

March 30, 1982

Mr. Erik Hansen
Brandenburg Demolition, Inc.
2110 South Marshall Boulevard
Chicago, Illinois 60623

Re: Disposal of Chemicals, Hammond, Indiana, Your Invoice 917-14

Dear Mr. Hansen:

I am enclosing Ashland Chemical Company's check for $5,000 representing Ashland's agreed-to contribution toward the cost of removing chemicals from the Hammond site. Ashland consented to this course of action in order that the clean-up might be expedited in light of time constraints placed on the involved parties by the U.S. Environmental Protection Agency.

Ashland has at all times maintained that the cost involved was the responsibility of the property owners, Rabin Brothers, by reason of the Bill of Sale and Indemnity Agreement between Ashland and Rabin Brothers. We intend, therefore, to seek reimbursement for our contribution toward the improvement of the property.

Sincerely,

Charles Saunders Jr.

CSJr:mjc
Attachment

cc: William I. Fine, Esq.

Brandenburg
Demolition, Inc.

April 29, 1982

Efron & Efron

Re: Former Ashland Chemical property
Hammond, Indiana

You have noted that we have invoiced your client for time spent by William O. Somerville, who is an Attorney. We have not invoiced your client for any of the time spent by Mr. Somerville to thoroughly research the problem and find reasonably priced disposal methods. We have included only the time Mr. Somerville spent on the site supervising the separation, overpacking, and loading of the chemicals. Mr. Somerville was the only person in our organization who had sufficient knowledge to supervise this operation.

Please inform your client of his obligation to make prompt payment to Brandenburg in the Amount of $17,073.55 so that this matter may be concluded. Also remind him of his further obligation in the amount of $1,000 for the packaging of asbestos which his agents left in a loose condition. This asbestos was placed in plastic bags by Brandenburg at the request of Mr. Ken Rowell to prevent the EPA from citing Machinery & Equipment for improper handling of friable asbestos. I have enclosed a copy of our indated November 24, 1980.

Thank you for your help in these matters.

Yours,

BRANDENBURG DEMOLITION, INC.

Thomas J. Little
President

/ms
Encl.

cc: Kenneth Rowell, Machinery & Equipment Co.
Mel Schaeffer, Machinery & Equipment Co.
Irving Rabin, 600 3rd St., San Francisco, Calif.

2110 South Marshall Boulevard, Chicago, Illinois 60623 - (312) 521-3800

FF-3386 REV. 7-82

E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
WILMINGTON, DELAWARE 19898

June 7, 1985

FINISHES & FABRICATED PRODUCTS DEPARTMENT

Gentlemen:

Dismantlement D-3607
East Chicago Plant - East Chicago, Indiana
Central Shops and Miscellaneous Buildings

You are invited to bid on work involving the dismantlement and removal of Du Pont's facilities which are located at 5215 Kennedy Avenue in East Chicago, Indiana.

The "Specific Terms and Specifications" dated May 10, 1985 and its accompanying Exhibit "A" are attached and provide the details of the scope of work involved. Further information is given in the "General Conditions for Contracts Involving Dismantlements". Please read all information and be familiar with it prior to submitting your bid.

Interested Contractors should contact Archie Murrish at the Plant to arrange for inspecting the facilities to be dismantled and removed. Telephone: (219) 398-2040. Please bring hard hat and safety glasses with side shields with you if possible.

After your inspection, you are invited to submit your bid **IN WRITING BY LETTER ONLY** to the following P. O. Box address so that it will be received by 4 p.m. Wilmington time of the closing date. Bids received after that time cannot be considered. A self-addressed envelope is enclosed for your convenience. Be sure to forward all bids concerning the subject dismantlement to:

F&FP - INVESTMENT RECOVERY, D-3607
P. O. BOX 4500
GREENVILLE, DELAWARE 19807

CLOSING DATE: MONDAY, JULY 15, 1985

Your interest in this job is appreciated. We reserve the right to reject any or all bids. The successful bidder will be notified. You may call this office within two days after the closing date to learn how your particular bid placed among those submitted.

Very truly yours,

Joseph M. Shields, Jr. Archie 977-4662
(302) 992-2783

JMS:tmd/Attach.

May 10, 1985

DISMANTLEMENT D-3607
SPECIFIC TERMS AND SPECIFICATIONS

1. The facilities generally listed in the attached Exhibit "A" are offered to competitive bidding for dismantlement on an "as is - where is" basis only. They are located at Du Pont's East Chicago Plant and are the property of the Chemicals and Pigments Department.

2. In addition to the specific terms and specifications set forth herein, Contractor shall adhere to the terms and specifications in Exhibit "A" and "General Conditions for Contracts Involving Dismantlements" (Rev. 10-83) for this work. These are attached and made a part hereof.

3. Contractor shall submit a lump sum bid (please specify as payable by which party) for the work. Material resulting from this dismantlement shall become the property of the Contractor except those items in Exhibit "A" which are specified as being retained by Du Pont and the asbestos insulation, debris, and rubble which is discarded on the Site in accordance with Paragraph 13.

   Contractor shall submit with his bid the time necessary to complete the work.

4. Contractor shall carry, in addition to the insurance required in Article 12 of the "General Conditions", an excess liability policy in the amount of $2,000,000.

   This policy shall also name Du Pont as an additional insured for this dismantlement. A certificate indicating this insurance is in effect naming Du Pont as an additional insured and containing the following wording, shall be delivered to Du Pont prior to the start of work.

   "Contractor and any subcontractors are insured as to any liability, obligations, or responsibility undertaken by them in Dismantlement Contract D-3607, among which obligations are those contained in Article 14 (Indemnification) and Article 15 (Non-Warranty) in the 'General Conditions for Contracts Involving Dismantlements' (Rev. 10-83) which is a part of the contract."

   Article 12 of the "General Conditions" is hereby revised accordingly.

5. Contractor shall obtain the necessary demolition and disposal permit and shall send a copy of each, prior to the start of work, to the address shown in the body of the cover letter.

6. Contractor shall dismantle and remove the facilities in their entirety including supports and attachments down to the concrete.

   Contractor shall remove all concrete foundations, piers, walls, curbs, floors, slabs down to a minimum of below the surrounding floor or below the surrounding grade whichever is applicable.

   Contractor shall remove all independent concrete foundations and piers down to a minimum of below surrounding grade.

   Ground level concrete floors and pads shall remain in place.

   Contractor shall remove any anchor bolts and reinforcing rods down to the same level as the concrete is removed.

   Contractor to remove "French drain" tiles serving steam traps and utility pole down guy anchors to a minimum depth of six inches (6") below grade.

7. Contractor shall backfill all excavations, holes, and depressions remaining after the dismantlement as follows:

   Contractor may use sand or clean rubble not over four inches (4") in any dimension that is free from combustible material and excess steel rods to backfill the deeper holes up to a maximum of six inches (6") below the surrounding grade.

   Contractor shall fill all excavations, holes, and depressions, and cover any concrete fill with a minimum of six inches (6") of sand or crushed limestone acceptable to the Plant Representative.

   Contractor shall fill the shallower holes with sand or crushed limestone.

   Areas adjacent to blacktop or concrete shall be topped with crushed limestone.

   Contractor shall furnish all crushed limestone fill and topping material. Contractor may excavate and haul the sand backfill material from a location on the plant that is approximately one-half mile from the dismantlement site.

   Contractor shall grade the areas to blend with the surrounding grade and to maintain surface drainage with the surrounding areas and leave no tripping hazards. Contractor shall provide sufficient fill to insure this drainage.

7. Continued

Plant roadways, blacktop, and stone that are disturbed to remove railroad track or other structures shall be repaired by placing compacted crushed limestone so repaired area is at the same elevation as adjacent road surfaces.

Railroad track removal includes track and all ties except where track is imbedded in concrete. Depressions left by track to be filled with crushed limestone flush with adjacent grade or road surface.

8. Contractor is hereby put on notice that these facilities referred to in this dismantlement may have been used for flammable, toxic, or other dangerous substances such as saw dust, gasoline, fuel oil, and lubricants.

Some of these substances may still remain in these facilities. Contractor should become familiar with the hazards associated with these substances. Du Pont makes no guarantee or representation, expressed or implied, that the flammable, toxic, or other dangerous substances referred to herein have been lessened or removed to any extent.

Contractor understands that the assumption of responsibility and indemnity provisions of Articles 14 and 15 of the 'General Conditions' are fully applicable to Contractor with regard to such facilities.

Contractor also agrees to indemnify, defend and hold harmless Du Pont and its agents, employees, successors, and assigns against any and all suits, claims, damages, expenses, or liabilities, including reasonable attorney's fees, for any damage to any property or for any injury to, or the death of, any person arising out of, or resulting from, in any way the handling, dismantlement, removal, use, disposition, or conveyance of these facilities and equipment by Contractor or by any others.

Contractor further agrees to give notice to any third party to whom these facilities are later conveyed of the possible presence of such flammable, toxic, or other dangerous substances which may be present in these facilities.

9. Contractor shall consider that some of the pipe and equipment insulation contains asbestos, and Contractor shall be responsible for complying with all government regulations regarding asbestos. Contractor understands that the assumption of responsibility and indemnity provisions of Articles 14 and 15 of the 'General Conditions' are fully applicable to Contractor with regard to such

9. Continued

asbestos. Any pipe insulation not labeled "N" or "NA" must be treated as containing asbestos. Asbestos insulation shall be removed before buildings of other structures supporting pipe or equipment are disturbed. Sections of asbestos pipe or equipment may be lowered to the ground and insulation removed before supporting buildings or structures are disturbed.

Contractor shall notify the EPA and shall send Du Pont a copy of the EPA notification letter, to the address shown in the body of the cover letter, 20 days prior to the start of work. Contractor shall send Du Pont copies of Indiana asbestos disposal permits before removing asbestos from plant.

Contractor shall make all arrangements for and assume all costs for the disposal of the asbestos insulation.

10. Contractor and Contractor's employees must comply with the safety rules as found in the "Demolition Safety Manual" as published by the National Association of Demolition Contractors, dated 1981; the "Safety Instructions for Contractor's Performing Work on Du Pont East Chicago Plant," dated 8/80; and "Safety Rules for Contractors," East Chicago Plant, dated 1/83. Copies of both sets of Du Pont rules will be provided during facility inspection. In the event a rule from one set of rules is inconsistent with a rule from another set of rules or other requirements of this contract then the more stringent requirement applies.

11. Contractor may use a gas cutting torch for the dismantlement work (except on rubber-lined equipment), provided written permission in the form of a "Work Permit" is obtained from the Plant Representative before starting and provided the Contractor uses the torch in accordance with all regulations set forth by the Plant Representative. Some of these regulations, but not limited thereto, are as follows:

    a. A burning permit will be required each day.

    b. Contractor shall furnish and maintain in effective usable condition dry chemical type extinguishers (minimum size ten pounds) readily accessible to each burner.

    c. When an area in which cutting torches have been used is to be left unoccupied during breaks, lunch, or at the end of the working day, the area shall be inspected by a responsible representative of the Contractor to detect and extinguish any smoldering fires or residual hot slag.

11. Continued

    d. Compressed gas cylinders in storage or in use must be fastened securely in an upright position away from any source of heat or flame.

    e. No heavy or black smoke issuing from burning operations is permissible.

    f. Compressed gas cylinders shall not be taken inside operating building unless special permission is obtained from the Plant Representative.

12. No open burning of trash, scrap, or other material will be permitted.

13. Contractor shall remove all dismantled scrap materials and equipment that is not retained by Du Pont and all debris and rubble, both burnable and non-burnable, from the Site. The dismantlement area must be cleaned up daily.

    Contractor may, however, deposit brick and concrete that is free from combustible materials and excess steel rods on the Site in a location as designated by the Plant Representative. Such rubble shall be covered with sand to a depth of four inches (4") when deposits have been completed. Sand is available at the Plant as per Paragraph 7 on page 2.

14. Contractor shall clear all passageways, roadways, and railroad tracks of any dismantled material or rubble at the end of each workday.

15. Contractor shall barricade off dismantlement area and post warning signs to exclude unauthorized personnel. Access gates should be provided as needed. The barricade shall be constructed of yellow safety rope or yellow barricade tape 5/8 inches or more in width, maintained at a minimum of three (3) feet above grade and furnished by the Contractor. Extent of the area to be barricaded shall be designated during plant inspection. Barricades shall not be removed until released by the Plant Representative.

    All work shall be done within these limits unless special arrangements are made with the Site Representative.

16. Hard hats, approved safety glasses with side shields, safety shoes, and protective clothing to be furnished by the Contractor must be worn by the Contractor's employees at all times when on the plant.

17. Du Pont will not furnish compressed air facilities.

18. Contractor shall furnish adequate sanitary facilities for his employees, including those facilities required for persons handling asbestos.

19. Cafeteria or lunch room facilities are not available for Contractor's personnel.

20. Contractor shall furnish his own office and storage space for tools, materials, and process equipment and shall arrange for his own telephone service if it is desired.

21. Du Pont will weigh truckloads of the Contractor's materials on scales at the Site at no cost to the Contractor if requested in advance by the Contractor. If for any reason the scales are not operable, Du Pont will not be chargeable for any outside weighings.

22. In accordance with Articles 3 and 9 of the 'General Conditions' the following are some, but not necessarily all, of the Site regulations that must be adhered to by Contractor's employees.

    a. A meeting will be held with the successful Contractor prior to start of work at which time plant safety regulations and general procedures that Contractor will be expected to follow will be discussed.

    b. Smoking is permitted only in the locations designated by the Site Representative.

    c. Contractor must notify the Plant Representative of all equipment to be used on the Site which will radiate noise in excess of 90 DBA. The Plant Representative must approve the use of such equipment before it is brought onto the Site.

    d. Site parking and gate pass requirements will be explained during facility inspection. Contractor is responsible for communicating this information to his employees and any subcontractors.

    e. Site working hours are from 7:30 a.m. to 4:00 p.m. If Contractor's working hours are different, it should be so stated in his bid.

22. Continued

f. Contractor may work more than eight hours a day Monday through Friday or work on weekends provided he notifies the Plant Representative at least 24 hours in advance of each workday and provided he furnishes all extra equipment he may need such as electrical power for lighting. Article 4 of the 'General Conditions' is hereby amended accordingly. No additional compensation shall be allowed beyond Contractor's bid price for any premium incurred by his decision to work outside of regular hours.

g. Contractor is advised that the following are 1985 Du Pont holidays and, in general, no work should be scheduled for these days.

New Year's Day	Tuesday, January 1
Good Friday	Friday, April 5
Memorial Day	Monday, May 27
Independence Day	Thursday, July 4
Floating	Friday, July 5
Labor Day	Monday, September 2
Thanksgiving Day	Thursday, November 28
Day after Thanksgiving	Friday, November 29
Christmas Eve	Tuesday, December 24
Christmas Day	Wednesday, December 25

23. Contractor shall submit in writing to Du Pont's Site Representative a complete dismantlement plan for approval prior to starting work. This plan shall include the methods, procedures, materials, and equipment proposed to ensure the continuous protection of Du Pont property and personnel. This plan shall also include the methods, procedures, materials, equipment, sequence of events, and timing proposed to accomplish the dismantlement.

24. In accepting a contract with Du Pont, the Contractor agrees that a description of the work performed will not be used for publicity purposes.

25. In addition to evaluating proposals on the basis of lump sum bid and schedule, bidders' and their proposed tier subcontractors' safety performance records will be considered. To permit evaluation of the latter, bidders shall submit, with their bid proposal, Du Pont Contractor's Data Brief for themselves and each proposed tier subcontractor. Copies of the Data Brief are attached and may be reproduced by the bidder if necessary. A Contractor's Data Brief will be required to be submitted for any tier subcontractor added after contract award when requesting Du Pont's consent to so subcontract in accordance with Article 11 of the "General Conditions."

May 13, 1985

DISMANTLEMENT D-3607
EXHIBIT "A"

Description of the facilities to be dismantled and removed by the Contractor.

I. Central Shops Area

Area extends from track south side of Metal Shop (No. 111) to road north side of Central Shop and Stores (No. 110) and from Road east side of Central Shop and Stores (No. 110) to west side of Central Change House (No. 128).

A. Buildings
1. Metal and Car Shop Building No. 111 of brick steel and wood construction approximately 125' x 90'. Material storage racks north and west sides of building.
2. Central Shops and Stores Building No. 110 of brick, steel, and wood construction approximately 290' x 75'.
3. Central Change House Building No. 128 of brick, steel, and wood construction approximately 75' x 50'.
4. Compressed gas cylinder storage dock east of road east side of Building No. 110. Concrete, steel, and transite construction.

B. Equipment
1. Welding fume exhaust system, Building No. 111
2. Steam line servicing area starting from a point approximately 200 feet south of southeast corner of Building No. 111
3. Air line servicing area starting from a point approximately 200 feet south and 150 feet west of southeast corner Building No. 111
4. Electric lines serving buildings within the area including Poles EE 0241, EE 0259, EE 0280, and EE 0261.
5. Work and tool trailer east side Building No. 111.
6. Tank car rack and wood fence west side of Building No. 111.
7. Excess shelving and stores materials
8. Parking blocks in parking lots north of Building No. 111 and west of Building No. 128
9. Transformer fence and foundations north of road north of Building No. 110

C. Equipment to be retained by Du Pont or set aside for Du Pont
1. Steam and air line supports from header 200 feet south to east side of Building No. 111
2. Six-inch nitrogen line supported by Item 1 above
3. Sanitary sewer Pumphouse "A" east side of Building No. 110
4. Gasoline pump and storage tank north of Pumphouse "A"

C. Equipment to be retained by Du Pont or set aside for Du Pont (Contd.)

5. Electric lines servicing Items 3 and 4 above
6. Terminal box post and electrical leads from underground nitrogen pipeline--northeast corner Building No. 110
7. Air compressor (5 H.P.) on second level of Automotive Shop

II. TOB - Building K-2 Area

Area extends from south side of roadway south of TOB Building No. K-2 to south side of roadway north of Bldg. K-2 between a north-south line just east of Shift Supervisor's Office Building No. 4 and a north-south line approximately 50 feet east of Building K-2.

A. Buildings
1. Office and Change House Building, Building No. K-2 of brick and wood construction approximately 42' x 210'

B. Equipment
1. Tank truck loading rack
2. Pipe bridge from south side of road to Item 1
3. Overhead lines and supports within area
4. Three electric poles
5. Central heating and air conditioning unit for building
6. Parking lot blocks in area including those east of K-2
7. Old water heater south of building
8. Approximately 80 pieces 6-inch pipe on ground east of east warehouse

C. Equipment to be set aside for Du Pont
1. New water heater in south end of building

III. Electrical Connections

Areas of the plant outside the areas outlined in Parts I & II.

III. Electrical Connections (Contd.)

A. Electric Lines

1. Overhead electric lines and poles along road north of Building 110 and east of Building 110. Covers a ground distance of approximately 1300 feet and includes the following poles and associated brace poles and down guys:

EE 0031	
EE 0030	EE 0066
EE 0029	EE 0067
EE 0028	EE 0063
EE 0025	EE 0070
EE 0024	EE 0071
EE 0243	
EE 0023	EE 0264
EE 0022	
EE 0021	

IV. Railroad Tracks

A. Approximately 7,430 feet of railraod track and switches at various places in the plant as listed below. A map showing track locations will be available at the plant at the time of the plant inspection.

Track No.	Approx. Length
E-3	300
E-4	400
E-8	330
E-10	770
E-11	1,100
E-12	820
E-13	650
F-7	1,150
G-10	1,100
G-16	240
G-18	570
	7,430

out 1900 → 5500

Switch Nos. 11, 16, 17, 39 & 40

GS-10771 Rev. 10/83

GENERAL CONDITIONS
FOR CONTRACTS INVOLVING DISMANTLEMENTS
E. I. DU PONT DE NEMOURS AND COMPANY

1. SITE AND LOCAL CONDITIONS—The Contractor has the right to examine the site in order to acquaint itself with local conditions. It is understood, however, that the Contractor accepts conditions at the site as of the date of its proposal and no allowances will be made after award for any error or negligence by Contractor in this connection.

The work shall be done under the coordination, scheduling, and inspection of Du Pont. Any coordination, scheduling or inspection by Du Pont shall not relieve Contractor from its responsibilities specified hereunder.

If Contractor's work joins that of others done after the date of this order, Contractor shall notify Du Pont immediately in writing of any condition which may affect completion of the work or the cost thereof. Absence of such notification shall constitute an acceptance of the conditions at the site.

2. CHANGES AND EXTRA WORK—Du Pont may, by written direction, make changes in the work or authorize additional work. In all cases where the amount or character of the work is affected, any adjustment of the compensation must be authorized in writing by Du Pont's Finishes & Fabricated Products Department, Material Reclamation Systems, prior to performance of the change or additional work.

3. SAFETY AND HEALTH—Contractor shall: (a) comply with all federal, state and local regulations concerning safety and health, with applicable plant safety rules and regulations, and such other special safety provisions as may be set forth in the offering; (b) promptly report to Du Pont cases of death, occupational disease and OSHA-recordable injury caused by work on the job; (c) maintain an educational program to assure the inclusion of safety instruction as a part of job assignment; (d) arrange for first-aid treatment of job-incurred injuries in accordance with requirements of its insurer for Worker's Compensation Insurance.

If Du Pont notifies the Contractor of any noncompliance with the provisions of this Article and the action to be taken, the Contractor shall (immediately, if so directed, otherwise in not more than 48 hours after receipt of such notice) make all reasonable efforts to correct the existing conditions. If the Contractor fails to do so, Du Pont may stop all or any part of the work hereunder. When satisfactory corrective action is taken by the Contractor, a start order will be issued by Du Pont. No part of the time lost due to any such work stoppage shall be made the subject for claim for extension of time or for additional costs or damages by the Contractor.

Although Contractor must arrange for first-aid treatment, Du Pont may make first aid available to Contractor's employees, in consideration for which Contractor, its successors, and assigns hereby assume full and complete responsibility and liability for all injuries and damages to any of its employees arising out of or allegedly attributable in any way to such first-aid treatment and services. The Contractor understands that the indemnity provisions of Article 14 below are fully applicable with regard to such first-aid or medical services. Nothing contained herein shall be construed as imposing any duty upon Du Pont to provide facilities necessary to furnish first-aid treatment or related services to Contractor's employees or to make such facilities and services available to Contractor's employees.

4. SCHEDULE AND DELAYS—Contractor shall start dismantling operations after written authorization by Du Pont and shall complete all work in the time specified in the contract. Contractor shall adhere to a working schedule of eight (8) hours per day, five (5) days per week (Saturdays, Sundays, and Du Pont holidays excluded) unless otherwise specified in the contract.

Neither party shall be liable for delays caused by fire, flood, labor trouble, war, act of Government or any other cause reasonably beyond its control but shall use all reasonable efforts to minimize the extent of the delay.

5. BID PREPARATION—All drawings, dimensions, descriptions, materials of constructions and weights which are provided in attached Specific Terms and Specifications and Exhibits or supplied at the site are made available to the Contractor for his information as a guide and are not guaranteed by Du Pont. Contractor shall rely on his own skill, experience, knowledge, and physical inspection of the facilities in preparing his bid.

6. SUPERVISION—Contractor shall keep on the work a competent supervisor who shall be its authorized representative for all purposes under this Agreement.

7. DISCONNECTIONS AND UTILITIES AVAILABLE—Du Pont shall disconnect all service and process lines which are incidental to the building and/or facilities to be dismantled under this contract. Contractor shall dismantle said lines from the point of disconnection to the point of termination within the dismantlement area.

Unless otherwise specified in the contract Du Pont shall make available to Contractor at the nearest outlet to the dismantling site 110 volt electrical power and water at no charge to Contractor. Contractor, however, shall run the necessary lines at its own expense from the source to the dismantling site in accordance with plant safety practices and regulations.

8. COMPLIANCE WITH REGULATIONS—Contractor shall give such notices and secure and pay for permits, licenses, and easements required for its work.

9. WORKMANSHIP, EMPLOYEES AND HOUSEKEEPING—Contractor represents to Du Pont that Contractor has the necessary experience, skill, and equipment to accomplish the work hereunder. The work shall be executed in the best and most workmanlike manner in strict conformity with the best standard practice. Contractor shall have the exclusive control of the manner and method of performing the work and shall be responsible for persons engaged on the work. None of said persons shall constitute an employee of Du Pont.

Contractor and Contractor's employees shall not start work in an area or building without first having received permission, instruction, and identification from the Site representative. Contractor's employees shall confine themselves to areas designated by Du Pont and shall go to and from these areas by routes designated by the Du Pont representative. Contractor's employees will be subject to Du Pont's badge and pass requirements in effect at the site of the work.

The dismantlement site shall be kept clean and orderly at all times and shall not be used for the accumulation, storage, or display of salvage materials. At the completion of work, the dismantlement site shall be left in a broom-cleaned condition satisfactory to the Site representative.

10. TERMS OF PAYMENT—If the Contractor's bid results in payment of the contract price to Du Pont, said sum shall be paid prior to the commencement of the work. If the Contractor's bid results in a payment to the Contractor from Du Pont, the money shall be paid upon completion of the work to the satisfaction of Du Pont and receipt of the Release of Liens and Claims required by Article 16 hereof.

11. TAXES—Contractor assumes full responsibility for the payment of all Social Security, Unemployment Compensation and other taxes and charges for all employees engaged by Contractor in the performance of the services hereunder; and it will require each of its subcontractors, if any, to do the same.

12. INSURANCE—Contractor shall carry, at its expense, insurance in minimum limits as follows:

(a) Worker's Compensation—Statutory; and Employer Liability—$100,000 per accident.
- This item requires a Waiver of Subrogation against Du Pont.

(b) Comprehensive General Liability, Bodily Injury, and Property Damage in a combined single limit—$500,000 per occurrence.

(c) Comprehensive Automotive Liability Bodily Injury and Property Damage in a combined single limit—$500,000 per occurrence.
- If Contractor will not use its motor vehicles on Du Pont property in connection with the work being performed hereunder other than parking areas, a letter so stating is acceptable in lieu of the automotive insurance certificate. However, no vehicles of the Contractor or of its employees or subcontractors will be permitted upon Du Pont sites at locations, other than parking areas unless certificate has been submitted.

The above referenced General Liability insurance policies shall contain specific reference to the dismantling work provided for in this contract AND SHALL NAME DU PONT AS AN ADDITIONAL INSURED. Also such policies shall contain an endorsement whereby Contractor is insured as to any liability, obligation, or responsibility undertaken by Contractor in this dismantling contract, among which obligations are those contained in Articles 14 and 15 (Indemnification and Non-Warranty) hereof. Contractor shall maintain at its cost such other insurance as Du Pont may request in writing.

Certificates of insurance evidencing the coverages required above shall be filed with Du Pont's Finishes and Fabricated Products Department, Material Reclamation Systems, prior to the furnishing of services under this Agreement. Such certificates shall provide that the insurer will give Du Pont not less than thirty (30) days' advance notice of any changes or cancellation of coverage. In the event any subcontractor is employed, Contractor shall require subcontractor to carry the same coverages in the same limits.

13. TERMINATION—If Contractor should be adjudged a bankrupt, or should make a general assignment for the benefit of his creditors, or if a receiver should be appointed on account of his insolvency, or if he should fail to make prompt payment to subcontractors or for materials or labor, or disregard laws, ordinances or other governmental regulations, or violate any provisions of the contract, Du Pont may, on giving 7 days written notice, terminate Contractor's services, take possession of the premises and all things thereon and finish the work in any manner suitable to Du Pont. If cost of finishing the work exceeds the amount unpaid to the Contractor, Contractor shall pay Du Pont the difference.

14. INDEMNIFICATION—Contractor shall fully indemnify Du Pont against all loss and expense (including, without limitation, reasonable attorneys' fees) and for injury to or death of any person (including, without limitation, injury to or death of employees of Contractor or Du Pont) or loss of or damage to any property (including, without limitation, damage to Du Pont's or Contractor's property) incurred by Du Pont and resulting in any way from any act or omission, negligent or otherwise, on the part of Du Pont or Contractor, its agents, employees, subcontractors or assignees, in connection with the performance of this Agreement, except when such loss and expense are caused solely by the willful misconduct or negligence of Du Pont.

15. NON-WARRANTY—Property to which Contractor becomes entitled hereunder is transferred on an "As-Is" basis. DU PONT MAKES NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE QUANTITY, QUALITY, KIND, CHARACTER, CONDITION, OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY EQUIPMENT, FACILITIES, RELATED MATERIALS AND OTHER PROPERTY TO WHICH CONTRACTOR BECOMES ENTITLED IN ACCORDANCE WITH THIS CONTRACT. CONTRACTOR SHALL INDEMNIFY AND SAVE DU PONT HARMLESS FROM ANY AND ALL CLAIMS, DEMANDS, DAMAGES, ACTIONS, LOSSES AND EXPENSES (INCLUDING, WITHOUT LIMITATION, REASONABLE ATTORNEYS' FEES) WHATSOEVER ARISING FROM OR GROWING OUT OF THE REMOVAL, HANDLING, USE, DISPOSITION, POSSESSION, TRANSPORTATION OR CONVEYANCE BY CONTRACTOR OR BY ANY OTHERS OF SAID EQUIPMENT, FACILITIES, RELATED MATERIALS AND OTHER PROPERTY.

16. RELEASE OF LIENS AND CLAIMS—Contractor shall furnish Du Pont a complete "Release of Liens and Claims" before final payment is made. If any lien is filed or remains unsatisfied after final payment, Contractor shall indemnify Du Pont for all costs incurred in discharging such lien.

17. SUBCONTRACTS—Contractor shall not subcontract work hereunder without prior written consent of Du Pont. Rejection by Du Pont of any proposed subcontractor shall not obligate Du Pont for additional cost. If required, the Contractor will furnish Du Pont a copy of any subcontracts.

18. ASSIGNMENT—This Agreement shall not be assignable by either party without the prior written consent of the other.

19. INDEPENDENT CONTRACTOR—The employees, methods, equipment and facilities used by Contractor shall at all times be under its exclusive direction and control. Contractor's relationship to Du Pont under this Agreement shall be that of an independent contractor and nothing in this Agreement shall be construed to constitute Contractor, or any of its employees, an agent, associate, joint venturer or partner of Du Pont.

20. INTEGRATION—This contract, when executed, contains the entire agreement between the parties. There are no previous or contemporary understandings, representations or warranties not set forth herein. No subsequent modifications of this contract, including any conditions forming part of Contractor's bid, shall be of any force or effect unless in writing, signed by both parties.

21. RESERVATION OF RIGHTS—Du Pont's waiver of any of its remedies for a breach by Contractor is without prejudice and shall not operate to waive any other remedies which Du Pont shall have available to it, nor shall such waiver operate to waive Du Pont's rights to any remedies for a future breach, whether of a like or different character.

Brandenburg

Demolition, Inc.

June 18, 1980

Director, Enforcement Division
U.S. Environmental Agency
230 S. Dearborn Street
Chicago, Illinois 60604

Gentlemen,

This is to inform you that we are preparing to undertake a demolition project at the former Ashland Chemical Plant at 167th & Indianapolis Blvd., East Chicago, Indiana.

In connection with the latter, we anticipate the necessity of removing some asbestos insulating materials. We are, therefore, submitting the following attached information in compliance with the pertinent provisions of 40 CFR 61.22 (d) (2) (i-viii).

Yours Truely,

BRANDENBURG DEMOLITION, INC.

William O. Somerville
Safety Director

jms
Encl.

2110 South Marshall Boulevard, Chicago, Illinois 60623 (312) 521-2800

Brandenburg
Demolition, Inc.

NOTICE OF INTENT TO DEMOLISH

Per 40 CFR 61.22 (d) (2)

(i) Brandenburg Demolition, Inc.

(ii) 2110 S. Marshall Blvd., Chicago, Illinois 60623

(iii) Chemical Plant, 167th & Indianapolis Blvd., East Chicago, Ind.

(iv) 230 S. Dearborn Street, Chicago, Illinois

(v) Starting Date, approximately 10/01/80; tentative completion date 1/01/81

(vi) Manual Labor

(vii) Strip Asbestos, place in leakproof and properly labeled containers; deposit at waste disposal site of the type provided for in 40 CFR, 61.25.

(viii) C.I.D. Corporation, P.O. Box 214, Calumet City, Illinois

(ix) N/A

2110 South Marshall Boulevard, Chicago, Illinois 60623 - (312) 521-3800

CWM #5023 File Ashland

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL
SPECIAL WASTE DISPOSAL APPLICATION

CARD TYPE DATE 1/5/81 LPSWC AUTHORIZATION NUMBER _____ TRANS CODE _____ DATE ENTERED (Agency Use) / /

WASTE HAULER

HAULER REGISTRATION NUMBER 0753 NAME Brandenburg Demolition, Inc.

ADDRESS 2110 South Marshall Blvd. COMMUNITY Chicago

COUNTY Cook STATE IL ZIP 60623 AREA CODE 312 TELEPHONE 521-3800

WASTE GENERATOR

GENERATOR CODE _____ NAME Brandenburg Demolition, Inc.

ADDRESS 2110 South Marshall Blvd. COMMUNITY Chicago

COUNTY Cook STATE IL ZIP 60623 AREA CODE 312 TELEPHONE 521-3800

GENERATOR CONTACT NAME Jack Hesotian

DUNS NUMBER N/A SIC CODE 1795

PROCESS NAME Pipe Insulation

WASTE CHARACTERISTICS

GENERIC WASTE NAME Asbestos

IUPAC WASTE NAME Pipe and Boiler Insulation

TOTAL ANNUAL WASTE VOLUME 500 VOLUME UNITS 1 WASTE PHASE 1

TRANSPORT FREQUENCY 2 WASTE CLASS (Agency Use) _____

1 = ONE TIME, 2 = DAILY, 3 = WEEKLY, 4 = BI-WEEKLY, 5 = MONTHLY, 6 = BI-MONTHLY, 7 = QUARTERLY, 8 = SEMI-ANNUALLY

1 = CUBIC YARDS, 2 = GALLONS

1 = SOLID, 2 = SEMI-SOLID, 3 = LIQUID, 4 = GAS

DRUMS

(Code either "1" for Low, "2" for Medium, or "3" for High as appropriate for columns 21 through 26):

INHALATION TOXICITY 3 DERMAL TOXICITY 1 INGESTIVE TOXICITY 3 INFECTIOUS _____ REACTIVITY _____ EXPLOSIVE _____

FLASH POINT 200 °F ALPHA RADIATION _____ (pCi/L) COMPOSITION 2

1 = ORGANIC
2 = INORGANIC

PERCENT ACIDITY _____ PERCENT ALKALINITY _____ pH _____ PERCENT TOTAL SOLIDS 97.28

Ash Content 91.91%

KEY COMPONENT NAME	PERCENT	KEY COMPONENT NAME	PERCENT
1 Amosite Asbestos	30.0	2 Chrysotile Asbestos	20.0
3 LIMESTONE + INORGANIC SALTS	41.9	4 WATER	8.1
5		6	
7		8	

From: (302) 774-5445
Bernard J. Reilly, Esq.
E. I. du Pont de Nemours & Co.
1007 Market Street
DuPont Legal - D7082A
Wilmington, DE 19898

Origin ID: ZWIA

FedEx Express

J13111302120326

Ship Date: 29APR13
ActWgt: 4.0 LB
CAD: 9856601/INET3370

Delivery Address Bar Code

Ref #
Invoice #
PO #
Dept #

RECEIVED MAY 1 - 2013 ESS #2

SHIP TO: (312) 886-7048 BILL SENDER

Deena Sheppard-Enforcement Spclst.
U.S. EPA - Region 5
77 West Jackson Boulevard, SE-5J

CHICAGO, IL 60604

TUE - 30 APR 3:00P
STANDARD OVERNIGHT

TRK# 7996 3766 6513
0201

ZQ CHIA

60604
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